

## **Division Affected – Faringdon**

### **PLANNING AND REGULATION COMMITTEE**

**Date 19<sup>th</sup> January 2026**

**Outline flexible planning application for a total of up to (29, 573) sq m GIA of commercial floorspace for Use Classes E(g) i (offices); and/or, E(g)(ii) (research and development); and/or, E(g)(iii) (light industrial); and/or B2 (general industrial); and/or B8 (storage and distribution); and ancillary uses. All matters reserved for future determination except for access.**

#### **Report by Planning Development Manager**

**Contact Officer:** David Periam

**Location:** Former Wicklesham Quarry, Faringdon, SN7 7PH

**OCC Application No:** MW.0151/23

**VOWH Application No:** P23/V2519/CM

**District Council Area:** Vale of White Horse

**Applicant:** De Montalt Life Sciences Limited jointly with Mr Tom Allen-Stevens, Ms Cheryl Allen-Stevens, Frobisher (Wicklesham) Ltd

**Application Received:** 2<sup>nd</sup> November 2023

**Consultation Periods:**  
16<sup>th</sup> November – 7<sup>th</sup> December 2023  
20<sup>th</sup> May - 11<sup>th</sup> June 2024  
19th September – 10th October 2024  
8<sup>th</sup> – 30<sup>th</sup> May 2025  
26<sup>th</sup> June – 17<sup>th</sup> July 2025  
6<sup>th</sup> August – 21<sup>st</sup> August 2025  
26<sup>th</sup> September – 20<sup>th</sup> October 2025  
27<sup>th</sup> October – 12<sup>th</sup> November 2025  
1<sup>st</sup> December – 19<sup>th</sup> December

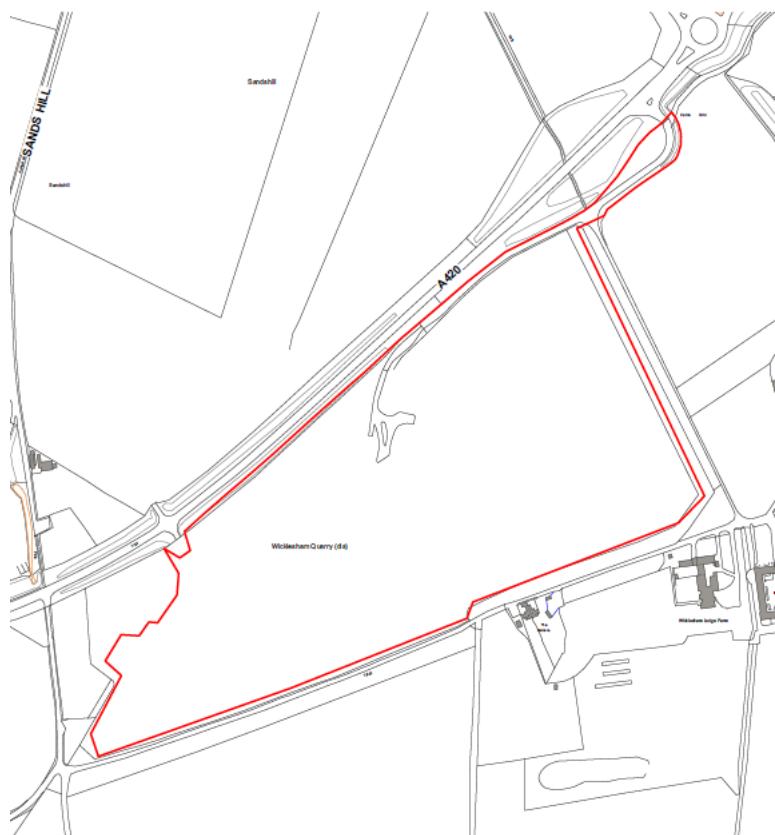
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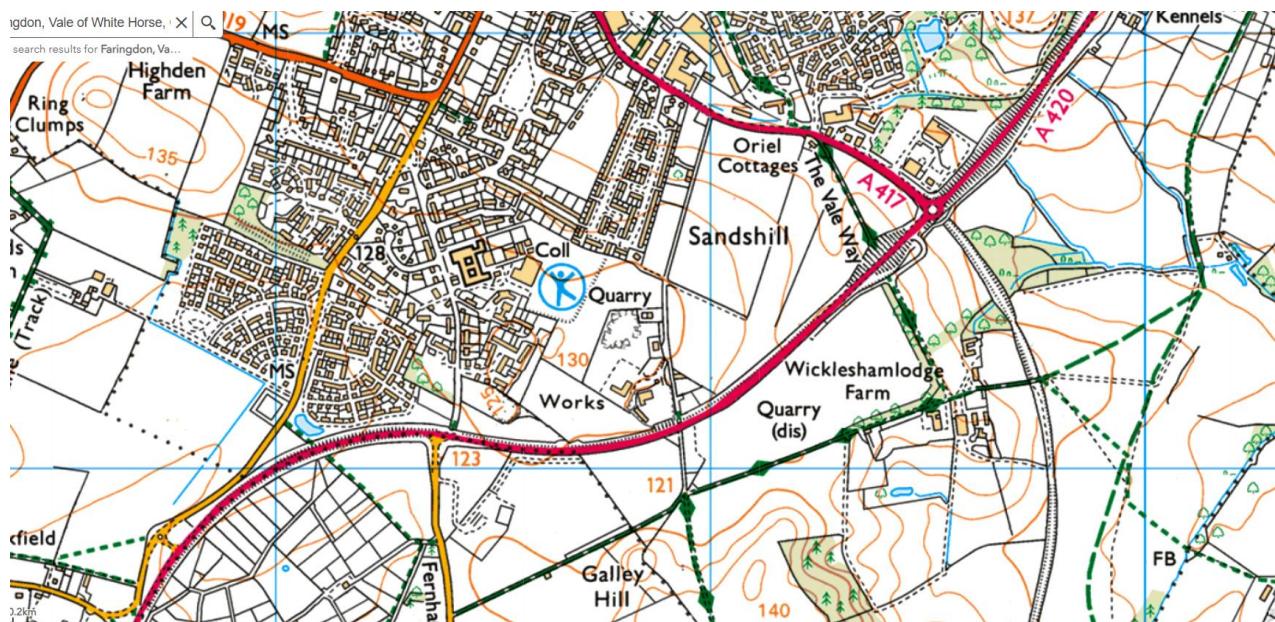
## PART 1- FACTS AND BACKGROUND

### Location (see Plans 1, 2 and 3)

1. The former Wicklesham Quarry lies in Vale of White Horse District and Great Faringdon parish.
2. The site lies immediately south of the A420, approximately 1km (0.6 miles) south of Faringdon. The application site includes an existing access onto the A420.



Plan 1 – Application Area



Plan 2 – Site Location



Plan 3 – Aerial view

## Site and Setting

3. The application site comprises a former quarry which has been restored to agriculture at the lower level. Mineral working has ceased, the quarry has been restored, and the five-year statutory aftercare period has been completed.
4. The application site covers a total of 11.7 hectares. It comprises agricultural fields, trees, shrub and hedgerow planting, retained mineral faces and two ponds. It lies approximately 8 metres below the level of the surrounding land,

with steep exposed quarry walls. The site is generally level, with a slight fall from west to east. There is a ditch along the southern boundary.

5. The site is within and surrounded by open countryside to the south of the A420. The site is located within the landscape character area of North Vale Corallian Ridge. The specific landscape character type of the site and its immediate surrounding area is defined as Rolling Farmland.
6. The A420 forms the northern site boundary, and immediately north lies Oriel Gardens, a Bloor Homes housing development on the edge of the built area of Faringdon. This development is currently being built. A service station and retail park lie 300 metres north east of the site, beyond a roundabout junction on the A420.
7. To the west of the site lies an active quarry, known as Faringdon Quarry. The eastern-most phase of this development has been worked and restored and incorporated into the restoration of Wicklesham Quarry such that the boundary between the sites is not identifiable on the ground.
8. The south of the site is bounded by a track carrying a bridleway (207/21/40), and the east of the site is bounded by a private access road leading to the collection of buildings at Wicklesham Lodge Farm, which carries a footpath (207/17/30). This footpath continues towards Faringdon centre on the other side of the A420 as footpath 207/17/20. Immediately south west of the site is a crossroads of tracks from where bridleway 207/22/10 runs south and bridleway 278/2/10 runs west.
9. The nearest properties to the site (1 The Gardens, 2 The Gardens and Wicklesham Lodge Farm) are immediately adjacent to the quarry on the southern boundary.
10. Lyde Copse Local Wildlife Site (LWS) lies approximately 1km south of the site.
11. The site lies within Flood Zone 1, the area of least flood risk. However, Environment Agency mapping shows that the site contains areas of low, medium and high risk of surface water flooding.
12. Wicklesham Lodge Farm, which houses a number of offices in former farm buildings, lies immediately to the south-east on the other side of a track. The complex of building includes a Grade II listed barn and granary 'Old Barn', 150 metres to the south-east of the site. There are also dwellings amongst these buildings.
13. An area of ancient woodland lies 200 metres to the east of the site, at Wicklesham Copse.
14. The entire site lies within Wicklesham and Great Coxwell Pits Site of Special Scientific Interest (SSSI). This is a geological SSSI designated due to exposures created during quarrying with geological and palaeontological

interest. The exposed quarry walls run along the eastern site boundary and parts of the northern, southern and western site boundaries.

15. The site is within the West Oxfordshire Heights Conservation Target Area (CTA).
16. The site has direct access to the A420 via a private road.
17. Lord Berner's Folly lies approximately 1.3 kilometres to the north-east on Folly Hill. This tower is a Grade II listed building, which can be viewed from the site.
18. Bridleway 207/21 runs parallel to the southern boundary and links to further bridleways to the south and west and continues to the east. Footpath 207/17 runs along the eastern boundary to meet the bridleway to the south and the A420 in the north, crossing the access road. It then continues towards Faringdon on the northern side of the A420. There is currently no crossing over the A420 but there are steps down the road embankment and signage. This footpath forms part of the Vale Way promoted route. The bridleway is higher than the site due to the quarrying activity.

## Planning History

19. Planning permission was first granted in 1986 for the extraction of sand and gravel from the quarry. Since then, the County Council has granted several permissions for the site mainly to extend the time to complete extraction of minerals and then restore the site but also for the importation of materials to be used in connection with construction of golf courses together with operations for the blending of imported and indigenous quarried materials.
20. The most recent permissions for the quarry (MW.0134/15 and MW.0133/15) required the cessation of the permitted operations by 30th September 2015 with restoration by 30th April 2016.
21. The land was restored in February 2018, and it formally entered the five-year aftercare period in July 2019. At the time that this application was submitted, the quarry was in its fifth and final year of aftercare. A final monitoring visit confirmed that aftercare was complete in July 2024.
22. The quarry to the west was originally permitted as an extension to Wicklesham Quarry and operates under permission MW.0117/16, granted in 2013. This requires mineral working to be complete by the end of 2034, restoration complete by the end of 2035 and therefore the five-year aftercare to be completed by the end of 2040. The extension site is now under different land ownership and is known as Faringdon Quarry.
23. An application for the development at the site (with the addition of reference to a data centre in the description of development) was submitted to Vale of White Horse District Council in 2023 and registered with reference number

P23/V1476/O. However, it was a County Matter application because the site is a former quarry which was still subject to an aftercare condition at the time the application was submitted. Therefore, the District application was invalidated and a new application was submitted to Oxfordshire County Council.

### **Planning Authority**

24. This application was made to Oxfordshire County Council because at the time it was submitted, the site was a former quarry subject to an aftercare condition. Aftercare was completed in summer 2024. Therefore, if the application was being made now, the correct planning authority would be the Vale of White Horse District Council. However, Oxfordshire County Council must determine the application which was correctly made to them.

### **Details of Proposed Development**

25. The application proposes up to 29,573 square metres of commercial floorspace. As an outline application, full details of the proposed development have not been provided at this stage. However, the buildings would be used for uses falling into specified use classes: offices, research and development, light industrial, general industrial and storage and distribution. The application also includes ancillary uses.
26. The application states that there is a market requirement for new research and laboratory accommodation in the vicinity of Oxford and suggests that the development would form new research and laboratory facilities serving the life sciences sector. However, the description of development is not specific in this respect and any permission granted further to this application would permit a range of potential industrial, storage, distribution and office uses.
27. A Parameter plan has been submitted as part of the application (Annex 5) along with a Phasing plan (Annex 5); these two plans are both submitted for approval whereas other submitted plans are illustrative at the outline application stage. Buildings of up to 12 metres high to the ridge are proposed over most of the site. A lower height for eaves is not specified in the submitted documents. The combined building footprints would be a maximum of 50% of the developable area (Area shown yellow on the Parameter plan). There would be a rectangular area excluded from built development extending into the site north-east from the southern boundary. There would be no buildings in this area to create a viewing corridor from the bridleway on the southern boundary, towards Lord Berner's Folly. The Phasing plan shows the development being carried out in three phases, phase 1 being the largest and forming the eastern part of the site, phase 2 being the northern part of the western part of the site and phase 3 being the southern part of the western part of the site.
28. Buildings would surround a central linear park, which would be planted with wildflowers. There would be ornamental landscaping adjacent to the buildings.

29. As the application is for outline consent, detail on the exact form that the buildings would take has not been provided at this stage. However, a Design Code has been provided, setting out design principles and indicative visuals, including an indication of materials. These indicative details show seven buildings, comprising 3 smaller rectangular buildings, 3 L-shaped buildings and a larger U-shaped building. Buildings would have a light-coloured base zone and this would either continue to building height or have a dark top zone, to break up the massing. Materials would be selected to allow the building to achieve a BREEAM 'Excellent' rating.
30. Ecological buffer zones and landscaping buffer zones are proposed to preserve the existing quarry walls and provide access to the geological faces. This would also protect areas of tree planting which is developing as part of the quarry restoration. The ecological buffer zones would be approximately 12 metres wide and the landscaping buffer zones would be approximately 10 to 11 metres wide.
31. An Illustrative Masterplan has been provided, showing a ring road around the outer edge of the buildings to service them, with green space in the central area forming the linear park, which the buildings would face. There would be woodland planting in the south-west of the site. Cycle stores and visitor parking, including disabled parking spaces would be provided in association with the buildings.
32. Although the Masterplan and Landscape Design are illustrative, the principles have been incorporated into the Design Code which supports the Parameter Plan which has been submitted for approval.
33. The proposal is for the park and boundaries to be seeded and tree-planted with open spaces adjacent to the buildings subject to more formal ornamental planting. However, the detail of planting and landscaping would be subject to condition.
34. Access would be via the existing A420 junction and private access road into the centre of the northern site boundary. Improvement works would include widening the A420 in this area and the junction to create a right turn lane to allow vehicles to turn right from the A420 into the site. It is proposed to reduce the speed limit in the vicinity of the junction to 40 mph. A surfaced 3-metre wide footway/cycleway would be provided along the access, leading to a new toucan crossing over the A420. To the north of the new toucan crossing, the footway/cycleway would continue along the current route of footpath 207/17/2 to meet Park Road. It is also proposed to extend the provision along the A420 to connect the existing footway/cycleway by bus stops.
35. Some existing trees would be removed, including one B-grade (moderate value) tree, one C-grade (low value) tree and one U-grade tree (dangerous). Two C-grade groups would be entirely removed, and four C-grade groups would be partially removed. The most significant area of tree removal would be around the site access.

36. The application was accompanied by an Air Quality Assessment, Waste Statement, Flood Risk Assessment and Drainage Strategy, Landscape and Visual Appraisal, Ecological Assessment, Noise Statement, Sustainability Statement, Transport Assessment, Framework Travel Plan and Heritage Assessment. Further to a request for additional information, an Arboricultural Impact Assessment, Arboricultural Method Statement and Geological Site Management Plan were submitted, along with Technical Notes to supplement the original Transport Assessment.
37. A BREEAM pre-assessment report sets out how the scheme could achieve an 'excellent' rating.

#### Amendments to the Application Since Submission

38. The application was originally submitted in November 2023. Following the initial consultation, further information and amendments were submitted in April 2024. The changes related to a reduction to the maximum height of the buildings, which was originally 25 metres (to ridge), to amended to 18 metres to the ridge (15 to eaves). In both the original proposals and the first amendment to the building heights, there was a proposed central corridor running diagonally from the north-east site corner, in which buildings would be subject to a lower maximum height, with no buildings in the southern part of the corridor.
39. A revised Landscape and Visual Appraisal, Design and Access Statement, Design Code and Site Sections were submitted to reflect the reduction in building height. The submission included a modified junction design at the entrance to the site, outside of the red line area. Technical Notes comprising an addendum to the Transport Assessment and a response to third party highways comments were received. There was a second consultation.
40. In September 2024, further information was submitted to respond to comments received during the second consultation. The description of development was also amended to reduce the maximum floorspace proposed. When the application was originally submitted, 42 286 square metres gross internal area (GIA) floorspace was proposed, but this was reduced to 33 592 m<sup>2</sup> GIA, as a consequence of a reduction in building height that had already been consulted on.
41. In April 2025, the application was amended again to further reduce the maximum building height and therefore maximum floorspace. The current proposals are for maximum building heights of 12 metres across the whole of the site to be developed, with a maximum floorspace of 29, 573 m<sup>2</sup> GIA. Further amendments were made in June 2025 to address the consultation responses of the council's Landscape Advisor and the District Council Heritage Officer. Updated biodiversity metrics and a Landscape & Ecological Mitigation And Enhancement Plan were provided in August 2025. The application was amended again in September 2025 to further address the consultation responses of the council's Landscape Advisor and District Council Heritage Officer to show a central landscaped linear park, additional landscape buffer and tree screening to the perimeter and restored pond habitat. Updated

biodiversity metrics and a Biodiversity Gain Framework Plan were provided in October 2025. Further amendments including to the biodiversity metrics and Biodiversity Gain Framework Plan, the Parameter Plan, the Design and Access Statement, Design Code and the Illustrative Masterplan were submitted in November and December 2025.

42. Should the council be minded to grant planning permission, the applicant has agreed the following contributions and matters which would need to be delivered through a Section 106 Agreement:

- i) Transport contributions a) £574,213.08 towards bus services, b) £21,154.00 towards bus service infrastructure and c) £3,265.00 towards Travel Plan monitoring.
- ii) Rights of way contribution – £65 000 towards surface and infrastructure improvements within c2km of the site.
- iii) Habitats Monitoring and Management Plan monitoring contribution.
- iv) Implementation of the management strategy for the quarry walls, including access to the geology by prior arrangement and education/interpretation provision
- v) Commitment to undertake the proposed works to highway to deliver the active travel improvements under a s278 agreement

## PART 2 – OTHER VIEWPOINTS

43. There were nine consultation periods. When the application was originally submitted it was for buildings up to 25 metres high. Following the comments received during the first consultation period, the application was amended to reduce the building height to 18 metres. A second period of consultation was held on the amended plans. Following that consultation, further amendments were made to reduce the maximum floorspace. A third period of consultation was then held. The application was amended again to reduce the maximum height to 12 metres, with a reduction in maximum height floorspace. A fourth consultation was held on the amended application. The Landscape Officer continued to object to the proposals and amended plans were submitted to address these and the District Council Heritage Officer's concerns and a fifth consultation period was held in June/July 2025 to allow comment on these amendments. A sixth period of consultation was held on the biodiversity related information received in August 2025. A seventh period of consultation was held on the amendments made in September 2025 and an eighth period of consultation on those made on the biodiversity related information in October 2025. Following further amendments to address consultee comments including to the Parameter Plan, a further period of consultation was carried out in December 2025. In response to comment received from the council's

44. The full text of the consultation responses can be seen on the e-planning website<sup>1</sup>, using the reference MW.0151/23. These are also summarised in Annex 3 to this report.

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<sup>1</sup>Click [here](#) to view application MW.0151/23

45. 243 third-party representations were received during the initial consultation. Nine of these were in support, three were in partial support and the rest were objections. 93 representations were received during the second consultation, of which five were in support and the rest were objections. 36 representations were received during the third consultation period, of which five were in support and the rest were objections. 8 representations were received following the end of the third consultation. 30 representations were received during the fourth consultation. 16 representations were received during the fifth consultation period, of which one was in support and fifteen in objection. 8 representations were received during the sixth consultation period of which one was in support and 7 in objection. 15 representations were received during the seventh consultation period of which one was in support and 14 in objection. Five representations were received during the eighth consultation period which were all in objection to the application. Four representations were received during the ninth consultation period of which one was in support and three in objection. For the subsequent consultations, people were advised that they did not need to write in again if their view had not changed, as all comments would be taken into account.

46. The main issues raised in representations included concerns about highway impacts, landscape impacts, concern about ecology and the geological SSSI, objections to the height and size of proposed buildings, concern about expansion of Faringdon beyond the A420, concern that this is not the correct site for this type of development and concerns with regard to the status of policy 4.5B of the Faringdon Neighbourhood Plan. More detail of the points raised are provided in Annex 4.

## **PART 3 – RELEVANT PLANNING DOCUMENTS**

47. In accordance with Section 70 of the Town and Country Planning Act 1990, planning applications must be decided in accordance with the Development Plan unless material considerations indicate otherwise.

### **Development Plan Documents**

48. The Development Plan for this area comprises:

- Oxfordshire Minerals and Waste Local Plan Part 1: Core Strategy (OMWCS)
- Oxfordshire Minerals and Waste Local Plan 1996 (Saved Policies) (OMWLP)
- Vale of White Horse Local Plan 2031 Part 1 (Strategic Sites and Policies)
- Vale of White Horse Local Plan 2031 Part 2 (Detailed Sites and Policies)
- Faringdon Neighbourhood Plan (FNP)

49. The Oxfordshire Minerals and Waste Local Plan Part 1: Core Strategy (OMWCS) was adopted in September 2017 and covers the period to 2031. The Core Strategy sets out the strategic and core policies for minerals and waste development, including a suite of development management policies. The OMWCS policies were relevant to the determination of this application at the point that it was submitted, because the proposal affected the restoration of the quarry, which made the application a county matter. In the time which has passed since the application was submitted, the aftercare period has finished, and the application would no longer be a county matter if the application was submitted now. Therefore, the specific policies of the OMWCS are not considered relevant to the determination of this application as it is not minerals or waste development and does not affect the restoration of a quarry.

50. The Oxfordshire Minerals and Waste Local Plan 1996 (OMWLP) was adopted in July 1996 and covered the period to 2006. Some policies of the OMWLP were replaced following adoption of the OMWCS in 2017 but 16 site specific policies continue to be saved, pending the allocation of new sites. None of these policies are relevant to this site, as the application is not for minerals development and the application is no longer a county matter. Therefore, the policies of the OMWLP are not relevant for the consideration of this application.

51. Faringdon Neighbourhood Plan (FNP) forms part of the development plan. County Matters are 'excluded development' which cannot usually be covered by Neighbourhood Plans. However, in this case the FNP has some weight even when the application was submitted, as the proposals are for development proposed for after the completion of quarry aftercare. As the aftercare period has now been completed, the council must have regard to the FNP policies as part of the development plan, so far as they are material to the development under consideration.

52. Objection has been raised with regard to the legality of policy 4.5B of the FNP. Whilst the FNP has been subject to past legal challenge and application for judicial review, this was turned down. Whilst the judge did criticise some aspects of the process, the decision was that whilst there was some internal conflict and legal errors made, these were not so significant as to undermine the legality of the decision and in those circumstances, since the outcome for the claimant would not have been substantially different if the identified legal error had not occurred, the court had to refuse relief and so the neighbourhood plan is lawful and part of the development plan.

53. Objection has also been raised that FNP policy 4.5B is inconsistent with and superseded by the Vale of White Horse Local Plan Parts 1 and 2 which do not similarly identify the application site for development. The FNP is part of the Development Plan and therefore a material consideration. The Local Plan did not need to reproduce policies in neighbourhood plans already adopted at the time.

## **Emerging Plans**

54. The emerging Joint Local Plan 2041 has been prepared between Vale of White Horse and South Oxfordshire District Councils. The Plan was submitted to the Secretary of State for independent examination, held 03 – 05 June 2025. The Planning Inspector's letter dated 26 September 2025, found that the Plan had not met the Duty to Cooperate and gave the two councils two options, to either withdraw their plan from examination, or ask the Planning Inspectorate to prepare a report setting out their conclusions. Subsequently and in light of the Ministerial Letter setting out central government's intention to remove the Duty to Cooperate in the new Local plan making system and so that it also be removed from plans in the current Local Plan making system, the two councils have written to the inspectors advising that they wish to resume the hearings and progress the Joint Local Plan through examination and, all being well, to adoption. A response from the inspectors is awaited, therefore the South and Vale Joint Local Plan 2041 is still considered as a submitted Local Plan. Upon adoption, the Joint Local Plan 2041 would replace the adopted Local Plans for Vale of White Horse District Council and South Oxfordshire District Council.
55. In December 2022, the Oxfordshire Minerals and Waste Local Development Scheme (13th Edition) (OMWDS) was approved at Cabinet. This set out a process for pursuing a new Minerals and Waste Local Plan which upon adoption would have replaced Part 1 and included Part 2: Site allocations. Since the publication of the OMWDS (13th Edition) central government have proposed significant changes to plan to make and also introduced a requirement for all Local Plans to be submitted by December 2026. It is considered the Council would be unable to meet this deadline and therefore in July 2025 Cabinet agreed to stop work on the new Minerals and Waste Local Plan and await the new plan making process. This is set out in the revised Minerals and Waste Development Scheme (14<sup>th</sup> Edition), which was published in July 2025. A revised Minerals and Waste Development Scheme will be published in due course. The Oxfordshire Minerals and Waste Local Plan Part 1: Core Strategy remains in place as part of the Development Plan for Oxfordshire.

### **Other Policy Documents**

56. The Oxfordshire Local Nature Recovery Strategy (OLNRS) is a coordinated strategy to develop a shared ambition to recover nature across the county, help wildlife to flourish, improve air and water quality, and mitigate the impacts of climate change. The strategy is part of a series to cover the whole of England and assist the delivery of the Environment Act 2021. The final version of the LNS was approved by the council at its Cabinet meeting on 21<sup>st</sup> October 2025. It is a material consideration in the determination of planning applications.
57. The emerging South Oxfordshire and Vale of White Horse Joint Local Plan is supported by a Local Landscape Designation (LLD) review (LUC 2024). This shows a candidate LLD: Faringdon and Buscot, which would adjoin the application site to the south.
58. Other documents that are relevant to determining this application include:

- National Planning Policy Framework (NPPF) (as revised December 2024)
- Planning Practice Guidance (PPG)
- Oxfordshire Local Transport and Connectivity Plan 2022-2050 (LTCP)

59. On 16<sup>th</sup> December 2025, central government published a consultation on the NPPF and other changes to the planning system. This consultation runs until 10<sup>th</sup> March 2026. Whilst it does not therefore at this time replace the current NPPF, it does provide indication of the intentions of central government with regard to the planning system and some weight should be attached to the draft policies and changes set out in it.

### **Relevant Development Plan Policies**

60. The VLP1 policies most relevant to the consideration of this application are:

- Core Policy 1 – Presumption in favour of sustainable development
- Core Policy 6 – Meeting Business and Employment Needs
- Core Policy 7 – Providing Supporting Infrastructure and Services
- Core Policy 15 - Spatial Strategy for South East Vale Sub-Area
- Core Policy 28 – New Employment Development on Unallocated Sites
- Core Policy 33 – Promoting Sustainable Transport and Accessibility
- Core Policy 35 – Promoting Public Transport, Cycling and Walking
- Core Policy 37 – Design and Local Distinctiveness
- Core Policy 39 – Historic environment
- Core Policy 40 – Sustainable Design and Construction
- Core Policy 42 – Flood Risk
- Core Policy 43 – Natural Resources
- Core Policy 44 – Landscape
- Core Policy 45 – Green Infrastructure
- Core Policy 46 – Conservation and improvement of biodiversity

61. The VLP 2 policies most relevant to the consideration of this application are:

- Development Policy 16 – Access
- Development Policy 17 – Transport Assessment and Travel Plans
- Development Policy 21 – External Lighting
- Development Policy 23 – Impact of development on amenity
- Development Policy 25 – Noise Pollution
- Development Policy 26 – Air Quality
- Development Policy 28 – Waste Collection and Recycling
- Development Policy 29 – Settlement Character and Gaps
- Development Policy 36 – Heritage assets

62. Draft South Oxfordshire District Council and Vale of White Horse District Council Joint Local Plan (JLP)

- CE1 – Sustainable Design and Construction
- CE2 – Net zero carbon buildings
- CE3 – Reducing embodied carbon
- CE6 – Flood Risk
- CE7 – Water Efficiency
- CE11 – Light pollution
- CE8 – Water Quality
- JT1 – Meeting Employment Needs
- DE1 – High Quality Design
- DE5 – Neighbouring Amenity
- DE7 – Waste Collection and Recycling
- NH1 - Biodiversity
- NH2 – Nature Recovery
- NH3 – Trees and Hedgerows in the Landscape
- NH5 – District Valued Landscapes
- NH6 – Landscape
- NH7 – Tranquillity
- NH8 – Historic Environment
- NH9 – Listed Buildings
- NH11 – Archaeology
- IN2 – Sustainable Transport and Accessibility
- IN5 – Cycle and Car Parking Standards
- SP5 – A Strategy for Faringdon
- HP6 – Green Infrastructure in New Developments

63. The following FNP policies are relevant:

- 4.5B – Wicklesham Quarry
- 4.7A – Materials and roofscapes
- 4.7E – Visual Impact

64. OMWCS and OMWLP 1996 policies are minerals and waste policies and are therefore not relevant to the determination of this application, however this report references OMWCS policy M10 in explaining the background to the application.

#### **Relevant Supplementary Planning Guidance**

- SODC and VOWH Joint Design Guide (2022)

- SODC & VOWH Green Infrastructure Strategy (2017)

## **Other Material Considerations**

65. Relevant sections of the NPPF include those on building a strong and competitive economy, achieving well-designed places, meeting the challenge of climate change and conserving and enhancing the natural environment.
66. Relevant sections of the PPG include specific advice on determining a planning application and natural environment.

## **PART 4 – ASSESSMENT AND CONCLUSIONS**

### **Comments of the Planning Development Manager**

67. The NPPF sets out a presumption in favour of sustainable development (paragraph 11), which is supported by VLP1 policy CP1. This means taking a positive approach to development and approving applications which accord with the development plan without delay.
68. All planning applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise, in accordance with the Town and Country Planning Act 1990. The key planning policies are set out above and discussed below in accordance with the key planning issues.

### **Quarry Restoration and Aftercare**

69. OMWCS policy M10 expects mineral sites to be restored to a high standard and in a timely and phased manner to an after-use that is appropriate to the location and delivers a net gain in biodiversity. It also states that restoration proposals should take into account the quality of agricultural land, the surrounding landscape, the amenity of local communities and capacity of the local transport network.
70. The site was restored in accordance with the approved restoration plan in 2018. The five-year aftercare ran until July 2024. Monitoring visits confirmed that the aftercare plan was being implemented satisfactorily, and aftercare was completed in July 2024.
71. The proposed development on the site would conflict with the restoration afteruse. However, there is no expectation in planning law or policy, that restored quarries will remain in their restoration afteruse in perpetuity. The requirement from the quarrying permission was to restore the site and then manage it for five years to facilitate the successful establishment of an

agricultural afteruse. This has taken place and there are no further obligations in relation to the quarry consent.

72. It is considered that whilst OMWCS policy M10 was relevant at the point that the application was submitted, it is no longer relevant since the statutory aftercare period was completed in July 2024. This application would not be a County Matter if it had been submitted after July 2024.
73. Following restoration and aftercare, quarries have the same status as any other greenfield land. The NPPF definition of Previously Developed Land specifically excludes former quarries which have been restored. There is nothing to prevent further development on the land, subject to compliance with other planning policies. The former use as a quarry lends no support to future development, but neither does it prevent it.

### **Principle of the development**

74. NPPF paragraph 85 states planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It goes on to state that the approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This proposal is for an outline consent that would enable the delivery of commercial floorspace that could be used in whole or in part for any of the uses set out in the application including offices, research and development facilities (although the application is not specifically for laboratory space), industrial processes, general industrial uses and/or a storage and distribution centre and ancillary uses to any of these.
75. NPPF paragraph 87 states that planning policies and decisions should recognise and address the specific locational requirements of different sectors, including making provision for clusters or networks of knowledge and data-driven creative or high technology industries, and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries and for storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation. Oxfordshire is already home to world leading science research facilities. Draft JLP objective 9 is to plan for enough new jobs, a flourishing local economy, and a wide range of jobs, not only in the science and innovation sector for which the districts are well known, but in the foundational economy which underpins this.
76. Therefore, the NPPF recognises the importance of finding appropriate sites for new businesses including new laboratory and life sciences space and for storage and distribution. Science and technology industries are already a key part of the local economy which the NPPF encourages should be built upon.

Whether or not this specific site is appropriate for the proposed uses needs to be considered through the determination of the application. Although the submitted information refers to research and laboratory facilities, the outline application is not specific about uses and if granted, an outline consent would allow a range of industrial, storage and office uses as set out above. Concern has been raised that an outline consent could allow different uses to the life science laboratory space indicated in the application. This is correct, however this is the nature of the outline planning consent that has been sought.

77. Concern has been raised about the loss of agricultural land, particularly as part of the site is grade 3a. However, the site has been allocated for employment use in the FNP and therefore the principle of development has been accepted.

### **Site Location**

78. VLP1 policy CP15 sets out the spatial strategy for the South East Vale Sub Area. This states 208 hectares of employment land will be provided for business and employment growth, in accordance with policy CP6. VLP1 policy CP6 states that proposals for employment related development on unallocated sites will be supported in accordance with CP28.
79. The site is not allocated for development in the VLP and is outside the existing settlement boundary of Faringdon. However, VLP1 policy CP6 states that proposals for employment on unallocated sites will be supported in accordance with VLP1 policy CP28. VLP1 policy CP28 states that proposals for new employment development (Use Classes B1, B2 or B8) will be supported on unallocated sites in or on the edge of, the built-up area of Market Towns, Local Service Centres and Larger and Smaller Villages provided that the benefits are not outweighed by any harmful impacts, taking into account the following:
  - i. the effect on the amenity of nearby residents and occupiers,
  - ii. the provision of safe site access for pedestrians and cyclists and for all types of vehicles likely to visit the sites, and measures to promote the use of sustainable modes of transport where possible, and
  - iii. the scale, nature and appearance of the employment development and its relationship with the local townscape and/or landscape character
80. Faringdon is defined as a market town in VLP1. Therefore, this policy lends support for the proposed B2 and B8 uses, subject to the above criteria being met.
81. It is considered that criteria i and ii are met. There are a limited number of properties within close proximity to the site and it is considered that the site design would ensure that there would be no unacceptable amenity impacts. There has been no objection from Transport Development Management, and

the proposed access for pedestrians, cyclists and vehicles is considered to be acceptable.

82. Criterion iii raises some concerns. The site is relatively large and even at the reduced height of 12 metres, the buildings would be high in comparison with other nearby buildings. By its nature, the design does not fit easily into the immediate landscape, or the townscape of Faringdon. This is partly because the development would be outside of the settlement boundary of Faringdon and on the other side of the A420, which currently marks the eastern and southern limit of built development. However, this in itself cannot be a reason for concluding that criterion iii is not complied with, as the FNP accepts the principle of the development of this site for employment use, which will inevitably lead to development beyond the current settlement boundary. However, the scale of the proposed development has raised concerns, which are addressed in more detail in the landscape section below.
83. VLP2 policy DP29 states that proposals must demonstrate that the settlement's character is retained, and physical and visual separation is maintained between settlements. It references VLP1 policy CP4, however policy CP4 relates to housing and is not relevant to this proposal. The development of agricultural land beyond the settlement boundary on the south-eastern limit of Faringdon, and on the other side of the physical boundary formed by the A420, has the potential to change the character of Faringdon and would extend its built area towards rural villages to the southeast, such as Fernham and Shellingford. However, the development would not compromise the physical separation between Faringdon and any other settlements, as the site area is limited in comparison to the extent of open countryside that would be remaining between settlements. The proposal is not considered to be contrary to VLP2 policy DP29.

#### Faringdon Neighbourhood Plan

84. When the application was submitted, the weight which could be given to FNP policies was limited, as County Matters are 'excluded development' for neighbourhood plans. However, the application would not be a County Matter if it were submitted now. Therefore, FNP can be given full weight at the point of determination.
85. FNP policy 4.5B is directly relevant. This site is safeguarded for employment uses (B2 and B8) following the completion of quarrying and restoration by the Faringdon Neighbourhood Plan, under policy 4.5B. This states that employment development will be supported on this site if no other suitable sites closer to the town centre are available, providing there is demonstrable need and subject to all the following criteria:
  - i) appropriate transport mitigation is provided;
  - ii) appropriate provision is made within the site for pedestrians and cyclists:

iii) the proposed employment development does not have a detrimental impact on the relationship between the site and the wider landscape in which it sits;

iv) appropriate ecological mitigation and enhancement measures are incorporated into the proposals;

v) any development would not result in demonstrable harm to the geological special interest of the site;

vi) employment proposals should incorporate measures to provide access to the protected site for the visiting public.

86. Further detail of these criteria is provided in the supporting text.
87. It is noted that the policy safeguards the site for employment (B2 and B8), which covers general industrial (B2) and storage and distribution (B8) uses. However, the proposed development is for use classes that may include B2 and B8, but also Use Class E(g)(i) (offices) and/or, E(g)(ii) (research and development); and/or, E(g)(iii) (light industrial), and these additional use classes are not referred to in FNP policy 4.5B.
88. Evidence that there is a need for this type of development has been submitted with the application. Other allocated sites in the FNP and VLP in the area are either already being developed or would be too small for the scale and type of development proposed. It is accepted that there is no other site closer to the town centre that would be suitable for the scale and type of development proposed. Letters of support have also stated that this is the case, and therefore the 'demonstrable need' referred to in the policy is considered to exist. There has been no objection from Transport Development Management or Active Travel England subject to conditions and completion first of a Section 106 Agreement to cover the items set out in Annex 2. It is therefore considered that criteria i) for appropriate transport mitigation, and ii) for appropriate provision within the site for pedestrians and cyclists, are met, subject to conditions and a Section 106 agreement to secure the necessary contributions.
89. Criterion iii) relates to landscape. Landscape is considered in detail in the section below. Overall, taking into account the Landscape Officer's views, it appears that whilst there is the potential for a detrimental impact on the relationship between the site and the wider landscape, contrary to this part of the policy, given the context of the policy support given by FNP policy 4.5B she does not object to the application subject to conditions.
90. Criterion iv) relates to biodiversity. Biodiversity is considered in detail in the separate section below and, taking into account the OCC Ecology Officer's views, the information submitted does demonstrate that there would be ecological enhancement and mitigation measures including the delivery of a biodiversity gain.
91. Criteria v) and vi) relate to the site's geological interest. This is addressed in more detail in the geodiversity section below, but the conclusions are that the proposal is unlikely to result in demonstrable harm to the geological interest of

the site. Arrangements for access have been offered through the Geological Site Management Plan. Overall, it is considered that criteria v) and vi) are met.

92. Overall, the proposal is considered to accord with the criteria of FNP policy 4.5B.
93. The FNP supporting text to policy 4.5B states that 'Wicklesham Quarry is considered by local stakeholders to be a significant opportunity site that would expand the provision of local jobs...A site of this scale could also encourage new types of businesses into the parish to help diversify the range of local jobs on offer...Any development on the site would need to be sensitively designed so as to be hidden within the landscape.' This text suggests that the policy anticipates the scale of employment development at the application site would be significant but also suggests an expectation that it could be 'hidden' in the quarry void.
94. It is considered relevant that Faringdon Town Council support the application and in their view the proposals meet the criteria of FNP 4.5B. They objected to the application as originally submitted and then removed their objection and indicated their support when the application was amended to reduce building height and further details provided. The Town Council has requested consideration of financial contributions to (1) help support the town centre and visitor economy and (2) enable the provision of sports/leisure/recreation facilities. NPPF paragraph 58 states that planning obligations must only be sought where they meet all of the following tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development. It is not considered that for the development proposed at the site proposed such contributions would be necessary, directly related to the development or fairly and reasonably necessary
95. As set out above, concern has been raised in representations that Faringdon Neighbourhood Plan is not in conformity with the Vale of White Horse Local Plan. However, it has been 'made' and forms part of the Development Plan, so its policies are relevant for determining this application.
96. However, specialist advice from the relevant technical officers should be accorded due weight in the planning balance.
97. Draft JLP policy SP5 1) c refers to providing new employment opportunities in Faringdon. Whilst the weight that this draft policy can be given at this point in time is limited, this offers some support to the general principle of employment development in Faringdon.

## **Design**

98. VLP1 policy CP37 states that all proposals for new development will be required to be of high quality design, and lists a number of criteria, including that the design must respond positively to the site, create a distinctive sense of place through high quality townscape and landscaping, provide legible and

easy to navigate spaces, is well connected to provide safe and convenient ease of movement to all users, incorporates green infrastructure and enhances biodiversity, is flexible to the changing requirements of occupants, is visually attractive, ensures sufficient well-integrated car and bicycle parking and is sustainable and resilient to climate change. Draft JLP policy DE1 similarly requires high quality design.

99. FNP policy 4.7A states that new buildings should be constructed using sympathetic building materials in keeping with the local character and style. The roofscape should be designed with careful regard for the potential impacts on the townscape and surrounding landscape.
100. FNP policy 4.7E states that all new build commercial buildings should be of a scale and form appropriate to their location and landscape setting and should create a high-quality environment combining the best modern design with local influences.
101. As this is an outline application, the detail of building design is not available for consideration. Therefore, this matter would be assessed at the reserved matters stage and the submitted Design Code is not considered to be contrary to FNP policy 4.7A at this stage.
102. VLP2 policy DP28 states that development proposals must ensure sufficient space for storage of recycling and refuse containers, the location of these should be integral to the design, separate from cycle storage, car parking and key circulation areas. It lists matters that will be considered in assessing refuse and recycling provision, including its location, security and impact on amenity. The applicant has submitted a Waste Statement addressing this policy. It confirms that although the detailed requirements of this policy are not applicable to an outline application, waste facilities have been considered and the design code requires the site to be accessible by waste vehicles and facilities to be located at convenient locations, which minimise visual impact across the site. Waste management facilities will not impact neighbouring amenity and site management will ensure appropriate security measures. The proposal is considered to be in accordance with VLP2 policy DP28.

## **Landscape**

103. The site is identified in the FNP in policy 4.5B for employment use, subject to criteria. This includes (iii) that the proposed employment development does not have a detrimental impact on the relationship between the site and the wider landscape in which it sits. VLP1 policy CP44 states that the landscape will be protected from harmful development, and where possible enhanced, in particular features such as trees, hedgerows, woodland, field boundaries and water bodies, important views and visually sensitive skyline and views, and tranquillity and the need to protect against light pollution, noise and motion.
104. The site is not located in a nationally or locally designated landscape, but the North Wessex Downs National Landscape is approximately 7 km away and is visible from elevated locations near the application site, including Lord

Berner's Folly. A candidate Local Landscape Designation (LLD) proposed under the emerging Joint Local Plan adjoins the site to the south (Faringdon and Buscot candidate LLD).

105. The Oxfordshire Landscape and Wildlife Study (OWLS) shows the development to be located in the Landscape Type 'Wooded Estatelands' and the Local Character Area 'Faringdon' (CR/2). Key characteristics of this landscape type include rolling topography with localised steep slopes, blocks of ancient woodland and mixed plantations of variable sizes, parklands and mansion houses, regularly shaped field pattern dominated by arable fields and small villages with strong vernacular character.
106. The Vale of White Horse Landscape Character Assessment (2017) shows the site to be located in the Landscape Type LM4 'Corallian Limestone Ridge with Woodland' and the Landscape Character Area LM4 'Coleshill to Faringdon and Fernham Corallian Limestone Ridge with Woodland'.
107. The VWH District Council have produced a number of landscape related documents as part of their JLP evidence base. Although the JLP has not yet been adopted, the OCC Landscape Officer has stated that the new landscape studies are being used in the decision making process. She has identified that the site is located in Landscape Character Area LCA 7A: Faringdon Ridge Hilltops in the Landscape Character Assessment 2024, which replaces the 2017 document. It also adjoins the Candidate Local Landscape Designation (LLD) Faringdon and Buscot.
108. The Landscape Officer has also listed the following new documents produced to support the JLP: Green Infrastructure Strategy and Open Space Study (2024), Tranquillity Assessment (2024), Local Landscape Designation Review (2024), Dark Skies/Light Impact Assessment (2024), Renewable Landscape Sensitivity Assessment (2024).
109. A Landscape and Visual Appraisal (LVIA) was submitted with the application and revised when the application was amended to reduce maximum building heights. The revised LVIA concludes that there would be a negligible magnitude of change to the wider landscape and a medium/high magnitude of change to the site and immediate surroundings during construction and on completion, reducing to medium after 15 years when new planting has established.
110. The Landscape Officer's most recent consultation response is set out in full in Annex 3. On the basis that the site forms part of the development plan, and the principle of industrial development on this site has been established by the allocation of the site in the Neighbourhood Plan, she considers the development on balance acceptable in landscape and visual terms subject to conditions including Landscape and Visual Impact Assessment at Reserved Matters Stage, design in line with the latest revision of the Parameter Plan and the principles outlined in the Design Code (including material and colour choices), building materials and roof design, lighting, detailed Landscaping scheme and long-term landscape management plan. The District Council has

advised that whilst previous detailed concerns have now been addressed, the scale and form of the proposed development remain at odds with the rural landscape character at the edge of the town.

111. The scale and location of the proposed development means that it does not fit easily with policies protecting the landscape. Whilst full details of the proposed development are not yet known, conclusions about the acceptability in landscape terms can be drawn on the basis of the information provided, including maximum floorspace and building heights. The applicant has made amendments to the application to address the landscape impacts of the proposed development from the original submission. Given the policy support provided by FNP Policy 45B, and subject to conditions, the council's Landscape Officer does not object to the application. As this is an outline application, the final design details will be a matter for reserved matter applications should planning permission be granted to this application. As far as is possible at outline application stage, it is considered that it has been demonstrated that there would not be a detrimental impact on the relationship between the site and the wider landscape in which it sits such as would support refusal of the application as being contrary to FNP policy 4.5B (iii) and to VLP1 policy CP44.
112. However, the assessment of the landscape impact is a matter of planning judgment and one that members will need to consider carefully for a major development in what is presently a rural location separated from the existing built development of Faringdon by the A420.

## **Trees**

113. As set out above, VLP1 policy CP44 states that trees, hedgerows and woodland will be protected and enhanced.
114. Following initial comments from the Tree Officer, an Arboricultural Impact Assessment was submitted, including a tree survey. This identifies trees that would need to be removed for the development to take place and sets out how trees to be retained would be protected.
115. The Tree Officer remained concerned about the removal of trees around the access point, given the value of these trees in the landscape. A revised Arboricultural Impact Assessment was submitted assessing the highway trees to be removed near the access as individual trees, rather than a group. This demonstrated that the majority are of low arboricultural value. There was no objection from the Tree Officer, although he states that a comprehensive landscaping plan would be required to help mitigate the loss of the significant number of trees to be lost. This could be considered in detail at the reserved matters stage. Conditions are requested for a detailed planting plan, landscape management plan and to secure the Arboricultural Method Statement and Tree Protection Plan.
116. The Arboricultural Officer also highlighted policy 14 of the Tree Policy for Oxfordshire, which states that the County Council will seek compensation from

any organisation or individual requesting removal of any public trees. This is information relevant for the applicant but is not directly relevant to the determination of the planning application.

117. Overall therefore, as there has been no objection from the Tree Officer, subject to conditions, the proposals are not considered to be unacceptable in terms of impacts on trees. However, the concern about the landscape impact of the loss of these trees is noted, and adds to the need for careful consideration of the potential landscape impact of the proposed development as set out in the section above.

## **Biodiversity**

118. NPPF paragraph 187 states that planning decision should contribute to and enhance the natural environment by, amongst other things, minimising impacts on and providing net gains for biodiversity. Amongst other things, NPPF paragraph 193 states that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.
119. The site is identified in the FNP in policy 4.5B for employment use, subject to criteria. This includes (iv) that the appropriate ecological mitigation and enhancement measures are incorporated into the proposals.
120. VLP1 policy CP46 states that development that will conserve, restore and enhance biodiversity will be permitted. Opportunities for biodiversity gain, including the connection of sites, large-scale habitat restoration, enhancement and habitat re-creation will be actively sought, with a primary focus on delivery in the Conservation Target Areas. A net loss of biodiversity will be avoided.
121. VLP1 policy CP45 states that a net gain in green infrastructure, including biodiversity, will be sought. Proposals for new development must provide adequate green infrastructure in line with the Green Infrastructure Strategy. Proposals will be required to contribute to the delivery of new Green Infrastructure and/or the improvement of existing assets including Conservation Target Areas in accordance with the standards in the Green Infrastructure Strategy and the Habitats Regulations Assessment.
122. Draft JLP policy NH2 states that development in VOWH must deliver at least 20% Biodiversity Net Gain (BNG), unless the development is not subject to the statutory framework for BNG. This is a draft policy and currently the statutory minimum is 10%. However, in this case, the development is not subject to statutory BNG, as the application was submitted prior to the Regulations coming into force. Therefore, even if the policy was adopted it would not apply. The relevant policy requirement for BNG is therefore found in VLP1 policy CP45, which states that BNG will be sought, but does not state a percentage.
123. The site was restored in accordance with the requirements of the previous mineral planning permission. This included a large area of grassland, two nest

ponds, woodland and hedgerow planting. The site has now passed through its five year aftercare period which was completed in 2024.

124. There is habitat suitable for Great Crested Newts (GCN) close to the site and on an aftercare monitoring visit in 2024, the OCC Ecologist noted that ponds within the site were holding water, including an additional pond not shown on the restoration plan. Therefore, an update to the ecological assessment and recommendations was requested. Concern about GCN was also raised in representations. The applicant responded with detailed information about GCN explaining that the site itself does not contain suitable habitat for breeding GCNs as ponds created through the quarry restoration fail to hold water. Standing water forms after heavy rain but then drains. They also explained why the site did not contain suitable terrestrial habitat and why GCNs in the wider area were unlikely to disperse to the site. Even if GCNs did access potential terrestrial habitat, this would be the rough grassland around the quarry margins and would not be directly affected by the proposal. A Construction and Environmental Management Plan (CEMP) could be conditioned which would include further pre-construction ecological assessments and any measures required to protect any protected species, including GCNs. The OCC Ecologist was satisfied regarding the response.
125. An Ecological Assessment was submitted with the application, which assesses the current ecological value of the site, the impacts of the proposed development and outlines proposed enhancements. It states that given the modest impacts of habitat loss within the footprint of the development and the extensive proposed areas of habitat creation and enhancement outside the development site, there would be a significant biodiversity net gain. Although the application is not subject to statutory BNG, BNG calculations and a metric spreadsheet were submitted to demonstrate how much BNG could be provided and these have been updated.
126. The OCC Ecologist concluded that the ecological assessment provided was appropriate and advised that there should be a condition for a further updated ecological appraisal and any phase 2 surveys required by this. He also requested that at least one of the ponds on site should be enhanced as part of the BNG.
127. Following further clarifications, the OCC Ecologist does not object to the application subject to conditions including for an updated ecological appraisal and any required phase 2 surveys, a Construction and Environmental Management Plan (CEMP), a lighting scheme, an updated BNG assessment and a Habitat Management and Monitoring Plan (HMMP), all to be based on the final development design. Therefore, if planning permission is granted to the application, it is recommended that any permission granted is subject to these requirements. A financial contribution to cover monitoring the HMMP would also be required.
128. It is noted that impacts on ecology have been a concern amongst those who submitted representations and that Bbowt object, expressing concerns about the methodology used for the BNG calculations. However, the OCC

Ecologist has confirmed that he has considered BBOWT's comments and does not agree.

129. Subject to conditions for the submission of details at the reserved matters stage as set out above, it is considered that the development meets the requirements of the above policies.

## **Geodiversity**

130. The site is identified in the FNP in policy 4.5B for employment use, subject to criteria. This includes (v) that any development would not result in demonstrable harm to the geological special interest of the site. VLP1 policy CP46 states development likely to result in the loss, deterioration or harm to geological conservation interests will not be permitted unless the need for the development outweighs the adverse effect, the development could not reasonably be located on an alternative site and measures are secured to avoid, mitigate and, as a last resort, compensate for the adverse effects. The level of protection and mitigation should be proportionate to the status of the site. Damage to the geological and palaeontological interest of the SSSI was a concern raised in representations, including in responses from individuals claiming expertise in this field.
131. A Geological Site Management Plan was submitted as further information prior to the second consultation. This was prepared by Oxfordshire Geology Trust. It sets out that there would be a 10-metre buffer around the quarry walls to protect them and allow access for viewing and management. It includes details of management of the quarry faces, to suppress excess vegetation and discourage the build-up of shrubs over the exposed walls. The exposed faces would be inspected on an annual basis and the fossil collecting spoil heaps mechanically turned at least once every two years. It states that there would be interpretation panels, with the location and content to be agreed through the reserved matters application. A virtual portal would be established so that the quarry walls can be viewed via computer. Access would be by appointment, to protect quarry faces and palaeontology from vandalism.
132. Whilst Oxfordshire Geology Trust are a consultee on applications at quarries in Oxfordshire, they have also prepared the Geological Site Management Plan submitted by the applicant. Therefore, some representations express concern about OGS's impartiality. Concern has also been raised that the geological SSSI covers the entire quarry, not only the walls.
133. In their second response, Natural England queried the proposed 10-metre buffer and encouraged the reinstatement of a 25-metre buffer to ensure better views of the geological features and for access for machinery. The applicant responded by providing a letter from Oxfordshire Geology Trust stating that the 10m buffer would be sufficient, particularly given that there would be a further 6m strip without buildings in it for roads and landscaping. They consider 25 metres would be excessive given the height of the quarry walls. Natural England were given the opportunity to comment further but did not respond. Overall, it is understood that the proposed 10 metre buffer is

acceptable. Nonetheless, the submitted Parameter plan shows ecological buffer zones approximately 12 metres wide and landscaping buffer zones would be approximately 10 to 11 metres wide, giving an overall buffer to the quarry walls of 22 to 23 metres.

134. Natural England have statutory responsibility for the geological SSSI and whilst expressing concern as set out, they have not raised objection to the application. Therefore, it is concluded that the development would not be likely to result in the loss, deterioration or harm to geological conservation interests, subject to conditions to secure the maintenance of the buffer set out on the Parameter Plan, implementation of the Geological Site Management Plan and ongoing provision for public access to the geological features in the quarry faces through a S.106 Agreement. Therefore, the development is considered to comply with FNP Policy 4.5B (v) and VLP1 policy CP46 in this respect. As the 25 metres buffer zone recommended by Natural England would not be provided, in accordance with the requirements of the Wildlife and Countryside Act 1981 as amended, it would be necessary to first advise them of any intention to approve the application subject to a S.106 Agreement and conditions and how their advice has been taken into account, prior to issuing any planning permission.

## Transport

135. VLP1 policy CP33 states that impacts of new development on the strategic road network will be minimised, developments should be designed to promote sustainable transport access and transport improvements will be designed to minimise effects on amenities, character and special qualities of the surrounding area.
136. VLP1 policy CP35 relates to promoting public transport, cycling and walking and states that new development should be located close to, or along, existing public transport corridors and adequate parking should be delivered in accordance with Oxfordshire County Council's parking standards.
137. VLP2 policy DP16 states that adequate provision must be made for loading, unloading, servicing and vehicle turning and proposals should demonstrate acceptable off-site improvements to the highway infrastructure, cycleways, rights of way and public transport can be secured, where these are not adequate to serve the development.
138. VLP2 policy DP17 sets out the requirements for Travel Plans and Transport Assessments to be submitted with planning applications.
139. A Transport Assessment was submitted with the application. This includes junction capacity assessments, demonstrating that whilst there would be some capacity issues on the network, these would occur regardless of whether the proposed development goes ahead. The A420 through-route would not be materially affected and overall, the development is not anticipated to give rise to any material off-site highways issues. It sets out the proposed improvements to encourage walking and cycling.

140. Transport Development Management initially objected to this application, requiring further work on the site access arrangements and a revised junction capacity analysis. Following the submission of further information, including amendments to the proposed junction, Transport Development Management have confirmed that they have no objections to the proposals subject to conditions and a S.106 agreement. The requirements include the provision of the proposed off-site highways improvement works, details of the access footway/cycleway, vision splay details, a Construction Traffic Management Plan (CTMP), Framework Travel Plan and Traffic Regulation Order for the raised island crossing. Active Travel England also have no objection to the application subject to conditions for a Travel Plan and provision of cycle parking. The proposals are considered to be safe from a highways perspective and the traffic impact is considered acceptable. The proposal is therefore considered to be in accordance with VLP1 policies CP22 and CP35 and VLP2 policies DP16 and DP17.

#### Access Road

141. Residents of dwellings accessed from the site access point off the A420 and the access road along the eastern site boundary, have expressed concern that construction works would cut off their houses and leave them with no access. However, it is not the case that granting planning permission to develop the site would have any impact on existing rights of access along this track.

#### Alternative schemes

142. A number of representations have requested changes to the access arrangements for both vehicles and active travel users. This includes requests that access should be direct from the roundabout, rather than the existing separate access road. Requests have also been made for a bridge over the A420, rather than the proposed signalised crossing. However, these do not form part of the proposal before the council for consideration. The application submitted must be considered on its merits, and there has been no objection to it from Transport Development Management.

#### **Rights of Way**

143. VLP1 policy CP37 states that development should incorporate and/or link to high quality Green Infrastructure, including public rights of way.

144. The OCC Rights of Way officer originally requested an additional A420 crossing point west of the site, for bridleway 207/29/10, and suggested that this could include a refuge island or signalised crossing with surface and infrastructure upgrade works. He also requested that the revised footpath layout to the northeast of the site be upgraded to a shared use cyclepath.

145. The applicant responded to confirm the rights of way improvements being proposed and stated that internal arrangements at the site are not for approval at outline stage.
146. In response to the further information and amended application, the Rights of Way officer confirmed that the signalised crossing is a reasonable alternative to a bridge over the A420 and noted and welcomed footpath and cycleway improvements. The additional crossing west of the site is not being taken forward, and there is no objection from the Rights of Way Officer.
147. The Rights of Way Officer also requested a contribution towards improving rights of way in the vicinity of the site, as set out above in paragraph 42. The applicant has agreed this.
148. Overall, the development is considered to be in accordance with VLP1 policy CP37. There are no rights of way within the application site area, but the proposals offer linkages to the wider network particularly through the delivery of a new footpath/cycleway link over the A420 and into Faringdon.

### **Amenity**

149. VLP2 policy DP24 states that development proposals should be appropriate to their location and should be designed to ensure that the occupiers of new development will not be subject to adverse effects from existing or neighbouring uses. Development will not be permitted if it is likely to be adversely affected by existing or potential sources of (amongst other things) noise, vibration and dust.
150. Therefore, consideration should also be given to potential impacts from the neighbouring quarry, which has permission for extraction until the end of 2034, on the proposed new use at this site. It is not considered that the existing quarry would have unacceptable adverse impacts on occupants of the proposed employment site. The quarry is controlled by suitable planning conditions and impacts are generally limited to within the site boundaries.
151. VLP2 policy DP21 relates to external lighting and states that there should be no adverse effect on the character of the area, neighbouring uses or biodiversity, no hazards for transportation or pedestrians and the lighting proposed is the minimum necessary. As this is an outline application, full details of lighting have not been provided. However, the location of the proposed development at the lower level of a former quarry, with screening vegetation, would mitigate impacts of any external lighting and it is considered unlikely that lighting would cause an amenity or safety impact. A lighting scheme can be required by condition.
152. VLP2 policy DP23 states that development proposals should demonstrate that they will not have significant impacts on the amenity of neighbouring uses in relation to a number of factors, including loss of privacy, daylight or sunlight, visual intrusion, noise, dust, pollution or lighting. The ecological and landscape planting buffer around the edges of the site would ensure that the built

development would not be close to the boundary and therefore the distance between the new buildings and existing residential buildings is considered sufficient to ensure that there would not be significant impacts on neighbouring amenity in terms of loss of privacy, daylight or sunlight. The setting of the buildings at the lower level in the quarry would mitigate visual intrusion as does the existing planting albeit this would be more limited in the winter months. It is not considered that there would be significant impacts from visual intrusion, dust or lighting that could not be mitigated by conditions.

153. VLP2 policy DP25 states that noise generating development that would have an impact on environmental amenity or biodiversity, and noise sensitive developments in locations likely to be affected by existing sources of noise, will be expected to provide an appropriate scheme of mitigation. Development will not be permitted if mitigation cannot be provided to an appropriate standard with an acceptable design.
154. The proposal has the potential to be noise generating and so a preliminary noise assessment was submitted with the application. This concludes that mitigation measures could be included in the detailed site design to mitigate noise impacts in line with national and local policy. Details of mitigation measures are not provided, as it is an outline application. However, they could include acoustic screening on the southern boundary, positioning of buildings around the service area, designing buildings so that the windows and doors do not face residential properties, conditions to control noise levels of fixed plant. Regarding increased traffic noise, the report concludes that this would be imperceptible.
155. The Environmental Health Officer has no objections and considers that the impacts of noise and dust on sensitive receptors should be considered as part of the full application (by which they are understood to mean reserved matter application).
156. VLP2 policy DP26 states that development proposals that are likely to have an impact on local air quality will need to demonstrate measures / mitigation that are incorporated into the design to minimise any impacts associated with air quality.
157. An Air Quality Assessment was submitted with the application. This concludes that although there is the potential for dust emissions during construction, these effects would not be significant as long as good practice dust control measures are implemented. Emissions from vehicles during the operational phase are also considered and also assessed as not significant. Therefore, the development is considered to be acceptable from an air quality perspective.
158. Draft JLP policy DE5 similarly seeks to ensure that development would not result in significant adverse impacts on the amenity of neighbouring uses.
159. Overall, the proposals are considered to be capable of being acceptable in terms of impacts on neighbouring amenity. Further detail of the proposed

development is required to assess the level of impact on specific receptors. This is not available at outline stage but would be provided through the reserved matters process. There is no reason to conclude that the proposal is not capable of complying with these policies. Therefore, the proposal is considered to be in accordance with VLP2 policies DP21, DP23, DP25 and DP26.

### Neighbouring Properties

160. Objections were received from occupants of nearby properties, some of whom were concerned that residential properties had been left off the application plans. I am satisfied that the closest properties to the site were clear on the application plans. Whilst the application documents did not clearly indicate which properties within the Wicklesham Lodge Farm building complex were used as residential dwellings, as opposed to offices and farm buildings, this is not considered to be material to the decision, as these dwellings are further from the site than the properties identified at The Gardens and Wicklesham Lodge Farm and would not suffer any greater impact.

### **Flooding and the Water Environment**

161. VLP1 policy CP42 states that the risk and impact of flooding will be minimised through directing new development to areas of lowest flood risk, ensuring new development addresses the effective management of all sources of flood risk, ensuring development does not increase the risk of flooding elsewhere and ensuring wider environmental benefits of development in relation to flood risk. It states that the sequential and, where necessary exception test will be used to assess the suitability of development in flood zones. Developments will be expected to incorporate sustainable drainage systems and ensure that runoff rates are attenuated to greenfield run-off rates.
162. Draft JLP policy CE6 similarly directs development to areas of least flood risk. The NPPF section on Planning and Flood Risk (paragraph 170 onwards) sets out when the sequential and exception tests should be applied.
163. A Flood Risk Assessment and Drainage Strategy was submitted with the application. This sets out that although the site is at low risk of tidal, fluvial and groundwater flooding, it is at risk from overland flows from the southwest. Details of how surface water would be managed are provided. A pumped outfall would be used to lift storm water from the quarry base. There would be a series of swales and ponds, and if necessary, attenuation tanks beneath the parking areas.
164. As the site lies in flood zone 1, the area of least flood risk, there is no requirement to undertake the sequential and exception tests with regard to fluvial flood risk. However, the site is subject to surface water flooding. The Flood Risk Assessment addresses this, noting that as the quarry is a significant excavation from the natural topography it is inevitable that models will show rainwater pooling there. Lidar data confirmed a significant area of

high ground falls towards the site from the south. However, there is a ditch on the southern boundary which would assist in intercepting rainwater. The FRA calculates that extending and deepening an existing depression would be sufficient to prevent flooding. The LLFA have confirmed that they have no objection, subject to a condition for a detailed surface water drainage scheme.

165. There has been no objection from either the Environment Agency or the LLFA subject to appropriate conditions. The site lies within the zone of lowest flood risk. Surface water management can be effectively addressed by condition. The proposed development is considered to be in accordance with VLP1 policy CP42.
166. With regard to the provision of water supply and foul water drainage, Thames Water as the relevant utility company have not objected to the application but have stated that the existing water supply and foul water drainage network does not have sufficient capacity to serve the development proposed. As such, they request that conditions be attached to any planning permission granted such that the development shall not be occupied until confirmation is provided that either: all necessary upgrade to the foul water and water supply network to accommodate the additional flows/the demand for water have been completed or relevant phasing plans for development and infrastructure have been submitted and approved.
167. Officers engaged further with Thames Water on this. Thames Water have advised that their assessment of this development has identified a potential risk to their ability to deliver services in accordance with our statutory obligations. This risk affects not only the proposed development but also existing customers within the same catchment area. To address this, hydraulic modelling will be required to determine whether sufficient network capacity exists. If capacity is inadequate, Thames Water must identify the necessary reinforcement to support the additional demand generated by the new development. Thames Water undertakes hydraulic modelling only after a development has received planning permission in order to ensure that resources are directed toward developments that are likely to proceed. Thames Water relies on the planning authority to impose appropriate conditions that align the occupation of new properties with either confirmation of available capacity or the completion of any required reinforcement works. Thames Water is committed to working collaboratively with developers to establish a phased plan for infrastructure and development. This can be done in one of two ways:
  - 1) Thames Water offer a pre-planning service. The applicant can understand from the point of planning their development whether there is sufficient capacity for their proposal or if network reinforcements are likely to be required. They will be given paperwork to support their planning application and be advised of the next steps to progress to hydraulic modelling once they own the land and have received planning permission.
  - 2) The applicant can send Thames Water proof of ownership, decision notice, drainage strategy for wastewater, connection plans for potable water and phasing information once they have received permission. Thames Water can

then commence hydraulic modelling the development for reinforcement and provide the applicant with the necessary documentation to discharge the condition at a later date.

Thames Water advise that in many cases, new connections can be made in parallel with reinforcement delivery. However, there will be instances where our network cannot accommodate new connections until reinforcement is fully completed.

168. The applicant has advised that they are familiar with the approach taken by Thames Water on other developments and that they have engaged in their pre-application advice, a copy of Thames Water's advice having been submitted as part of the application documents. The applicant has also advised that their structural engineer has also been liaising with Thames Water on practical matters including connection points. Thames Water's consistent response to them has been that they will not allocate internal resource until outline consent is secured.
169. The applicant considers that the pragmatic response is to secure outline consent with an appropriate condition ensuring connections cannot be made until capacity is available which is consistent with Thames Water's own statutory obligations and established practice elsewhere.
170. VLP1 policy CP7 addresses Supporting Infrastructure and Services. This sets out that all new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal. I am concerned at permitting development where the relevant consultee is advising that the infrastructure is not in place at this time. However, it is the case that Thames Water is the relevant body to provide the infrastructure to meet the requirements of development and has statutory obligations under the Water Industry Act 1991 as amended to provide, improve and extend a system of public sewers and to develop and maintain an efficient and economical system of water supply. The legal onus is therefore on Thames Water to provide the infrastructure, not the applicant. They have not raised objection to the application subject to the conditions cited. As this is an outline application, it is therefore concluded that conditions can be attached requiring that the development is not occupied until connections to the relevant infrastructure for foul water disposal and water supply have been provided. This is consistent with the approach taken by other planning authorities in the determination of outline planning applications.
171. Thames Water have also requested that a condition be attached to any permission granted requiring that no construction take place within 5 metres of a strategic water main. This can be provided for by condition.

## **Historic Environment and Archaeology**

172. VLP1 policy CP39 states that new development should conserve, and where possible enhance, designated heritage assets.

173. VLP2 policy DP36 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight will be given to the asset's conservation and the more important the asset, the greater the weight that will be given. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harms to its significance.
174. VLP2 policy DP37 states that proposals for development within or affecting the setting of a Conservation Area must demonstrate that it will conserve or enhance its special interest, character, setting and appearance.
175. VLP policy DP38 states that proposals for development within the setting of a Listed Building must demonstrate that they will preserve or enhance its special architectural or historic interest and significance. Proposals within the setting of a Listed Building must demonstrate that they will: respect, preserve or enhance features that contribute to the special interest and significance of the building.
176. Draft JLP policy NH8 similarly seeks to protect heritage assets, with NH9 specifically addressing listed buildings.
177. NPPF paragraph 213 states that any harm to the significance of a designated heritage asset requires clear and convincing justification and substantial harm to grade II listed buildings should be exceptional. Paragraph 215 states that where a proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use. Paragraph 216 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. NPPF paragraph 219 states that Local planning authorities should look for opportunities for new development within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
178. A Heritage Assessment was submitted with the application. This confirms that as a former quarry, most of the site has no remaining archaeological interest. However, it recommends an archaeological watching brief in relation to the access road. The response from the council's archaeologist stated that there are no archaeological constraints and no conditions have been requested.
179. The submitted Heritage Assessment concludes that the site makes a largely neutral contribution to the immediate historic environment setting of the Grade II Listed barn and granary, Old Barn, which lies 150 metres to the south east of the site. It states that it is possible that the new buildings proposed would be visible from the northern end of the Old Barn, which could have a very minor negative effect on the wider, rural setting of the listed building. It also

concludes that the scheme would also be visible from non-designated heritage assets, including other buildings within the Wicklesham Lodge farmstead complex. The scheme could therefore have a very minor, negative effect on the wider, rural setting.

180. The VOWH Conservation Officer has commented that the proposals by virtue of their scale fail to preserve or better reveal the contribution that the rural and agricultural setting make to the identified heritage assets. The response also identifies concerns about the visual impacts on Faringdon Conservation Area and the setting of Lord Berner's Folly and also Great Coxwell Conservation Area. It also references the visual impacts on the undesignated heritage asset 'The Gardens', and designated and undesignated heritage assets at Wicklesham Lodge Farm south-east and east of the site.
181. They conclude that agreement of roof materials and planting is necessary to reduce the visual impact of the development on the adjacent designated and non-designated heritage assets. Subject to this the identified impacts would be harmful, but less than substantial.
182. I agree with the Conservation Officer's conclusion that subject to the roof materials and planting details which could be provided as reserved matters impacts on the significance of designated and undesignated heritage assets would be less than substantial. Subject to this, NPPF paragraphs 215 applies in the case of the designated heritage assets and the harm must be weighed against the public benefits of the proposal. In this case, the new development is relatively shielded from Old Barn, as Old Barn is set within a courtyard of other previously agricultural buildings and it is also screened by vegetation. The closest of the new buildings could be visible through vegetation from the northern end of Old Barn, but it would depend on the final design and height of the buildings which is not yet known other than it would not exceed 12 metres in height. Overall, it is accepted that the harm to the setting of the Listed Building would be limited, although it would be permanent.
183. The impact on the setting of Lord Berner's Folly on Folly Hill is considered to be of greater concern. Whilst at some distance, the Folly stands on top of a hill from which the land falls on all sides and settles into the rolling landscape extending to the south. Its setting is extensive and includes the application site. It is noted that there is new built development being carried out which is extending the built footprint of Faringdon to the north of the A420 and that this also sits within its setting. However, there is a clear and open window of largely open countryside being a mix of agricultural land and woodland which includes the application site. The submitted Parameter plan includes a rectangular area excluded from built development to create a viewing corridor from the bridleway on the southern boundary towards Lord Berner's Folly, it is considered this would provide some mitigation. The Folly also lies within the Faringdon Conservation Area which includes Folly Hill and extends up to Stanford Road. There would also be limited mitigation of the impact on the Faringdon Conservation Area and there would be some lesser impact on Great Coxwell Conservation Area which lies at some distance to the west of the application site.

- 184. The public benefits to be weighed against the identified harms include securing the long-term management of the geological SSSI, the improved active travel infrastructure including a crossing over the A420 and the provision of additional jobs. In my view these public benefits can be weighed against the less than substantial harm to heritage assets to reach a conclusion that the proposal is, on balance, not contrary to NPPF paragraph 215 and to the Development Plan policies protecting heritage.
- 185. Similarly, in consideration of the visual impacts to the undesignated heritage assets, NPPF paragraph 216 applies and the significance of these assets should be taken into account in the decision.
- 186. There is also a requirement to take into account section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. In my view, the proposal would preserve Old Barn listed building and also largely preserve its setting however it is considered that it would impact more greatly on the setting of Lord Berner's Folly and the Faringdon Conservation Area and their settings.
- 187. The development would introduce a relatively large scale urban built form to a previously agricultural landscape. The applicant has sought to mitigate this including by reducing the maximum height of the buildings proposed from 25 metres to 12 metres. There would be impacts on the setting of designated heritage assets, particularly Lord Berner's Folly and Faringdon Conservation Area and on non-designated heritage assets. When balanced against the public benefits it is considered that the application complies with development plan policies aimed at protecting heritage assets, including VLP1 policy CP39 and VLP2 policies DP36, DP37 and DP38.

### **Climate Change and Natural Resources**

- 188. VLP1 policy CP40 encourages developers to incorporate climate change adaptation and design measures to combat the effects of changing weather patterns and lists a number of example measures, such as use of planting, materials, natural ventilation and window orientation.
- 189. VLP1 policy CP43 states that developers should make provision for the effective use of natural resources, including through the minimisation of waste, use of recycled materials, making efficient use of water, avoiding the development of best and most versatile land and re-using previously developed land.
- 190. Draft JLP policy CE1 seeks new development to minimise carbon and energy impacts and to be designed to improve resilience to the effects of climate change. It sets out that all new non-domestic buildings must complete CIBSE TM52, which is an overheating assessment methodology. Draft JLP policy CE2 requires new non-domestic buildings to achieve a space heating demand

of <15 kWh/m<sup>2</sup>/year and require new offices to achieve a Total Energy Use Intensity (EUI) of 55 kWh/m<sup>2</sup>/year. Draft JLP policy CE3 requires all new major development to complete a whole life carbon assessment in accordance with RICS Whole Life Carbon Assessment guidance and demonstrate actions to reduce life-cycle carbon emissions and requires new non-residential development over 5000m<sup>2</sup> to limit embodied carbon to 475 kgCO<sub>2</sub>e/m<sup>2</sup> GIA.

191. The Sustainability Statement provided with the application sets out how passive solar heating and lighting would be maximised through building orientation and proportions, how energy demand would be reduced through design, allowing for the use of green energy sources such as air source heat pumps. It states that PV technology installed on buildings where they can be orientated south. Water use would be well managed to secure BREEAM excellent, including water monitoring, leak detection and water efficient equipment.
192. Whilst details of the building design are not known at outline stage, it is considered that the proposals are capable of being carried out in a way which conserves natural resources and takes into account the need to reduce carbon emissions to mitigate climate change. The design would also take into account potential effects of climate change. Further details would be provided at the reserved matters stage, once building and site design are finalised, however on the basis of the information submitted, the development appears capable of complying with VLP1 policies CP40 and 43. The detailed specifications required in the draft JLP policies are not yet part of the development plan.

## **Sustainable Development**

193. VLP1 policy CP1 reflects the presumption in favour of sustainable development contained in the NPPF. It states that applications in accordance with policies in the plan will be approved unless material considerations indicate otherwise.
194. There is support for the development in development plan policy notably FNP policy 4.5B. The development would though introduce new commercial development into what is currently a rural location with potential impacts which have been addressed above. It is considered that the decision on this application is a finely balanced one which will require careful consideration. On balance, it is the officer advice that outline planning permission should be granted subject to completion of a S.106 Legal Agreement and to conditions including for the details of the development to be subject to reserved matter applications and as such it would be sustainable development.

## **Financial Implications**

195. Not applicable as the financial interests of the County Council are not relevant to the determination of planning applications.

## **Legal Implications**

196. The report determines the application in accordance with the Town and Country Planning Act 1990 (as amended) and all relevant legislation and guidance.

## **Equality & Inclusion Implications**

197. In accordance with Section 149 of the Equality Act 2010, in considering this proposal, due regard has been had to the need to:
  - Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
  - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
  - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
184. It is not however considered that any issues with regard thereto are raised in relation to consideration of this application.
185. In writing this report due regard has been taken of the need to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups. It is not however considered that any such issues are raised in relation to consideration of this application.

## **Conclusions**

186. This application is contentious, and objections have been received from local residents, neighbouring Parish Councils and the OCC Landscape Officer. However, some letters of support have also been received from the public and Faringdon Town Council support the application as according with the Neighbourhood Plan, specifically policy 4.5B. There has been no final objection from the Environment Agency, Natural England, Active Travel England, OCC Transport Development Management, the OCC Landscape Advisor or OCC Ecology Officer. The District Council Heritage Officer has identified that, there would still be less than substantial harm to heritage assets which needs to be weighed against the public benefits.
187. The development of the application site for employment use is specifically supported by FNP policy 4.5B. As this application is for outline consent only, full details of the proposal are not available. Therefore, impacts on landscape have been assessed on the basis of the maximum floor space, building heights and developed area of the site as shown on the submitted plans. Concerns raised by the Heritage Officer at VOWH District Council about potential impacts on the setting of heritage assets also link to the landscape

impacts as they are both concerned about the scale and visual impact of the development within the context of the area's rural landscape.

188. The proposals are in accordance with other development plan policies, including those relating to transport, flooding and climate change. It is not possible to fully assess the proposals in terms of design or amenity impacts on the basis of the information provided, but it is concluded that the proposal is capable of complying with those policies.
189. The heritage asset concerns can be considered alongside the NPPF paragraph 85 requirement that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development and the local support for this through the delivery of employment floorspace on this site, demonstrated through its identification in the FNP, and the support of Faringdon Town Council to this application.
190. It is considered that the proposal therefore does meet the criteria in FNP policy 4.5B which safeguards the site for employment use and the proposal has support from the NPPF as it would support economic growth and would provide a type of development for which there is demand at a site which has been identified for such a use by the local community in the Neighbourhood Plan.
191. The benefits of the development must be weighed against the potential harms identified. This application is finely balanced and members will need to consider very carefully the evidence before them both for and against the proposed development, but my recommendation is that the benefits do outweigh the harms. The application has been before the county council for the over two years, it has been amended and supplemented by additional information a number of times and further consultations carried out and it is considered that a decision should now be made on it.
192. If the committee is minded to grant planning permission, it is asked to consider whether it would wish any of the detailed submissions to be reported to the committee for determination.

## **RECOMMENDATION**

**It is RECOMMENDED that subject to a Traffic Regulation Order to secure the raised island crossing and a Section 106 agreement to cover the matters outlined in Annex 2, planning permission for MW.0151/23 be approved subject to conditions to be determined by the Director of Economy and Place, to include those set out in Annex 1.**

**David Periam**  
**Planning Development Manager**

Annexes:

- Annex 1: Conditions
- Annex 2: Section 106 Heads of Terms
- Annex 3: Consultation Responses
- Annex 4: Representations
- Annex 5: Parameter Plan
- Annex 6: Phasing Plan
- Annex 7: European Protected Species

## Annex 1 – Conditions

1. Complete accordance with approved Parameter Plan and Phasing Plan;
2. Commencement within 3 years;
3. Approval of reserved matters, including site layout, elevations, design (including roofs), materials (including colours), specified uses to be in accordance with the principles set out in the Design Code;
4. Submission and approval of Landscape Visual Impact Assessment;
5. Submission, approval, implementation of Landscape Management Plan (Possibly incorporated into the HMMP);
6. Submission, approval, implementation of detailed landscaping and planting plans;
7. Submission, approval, implementation of Arboricultural Method Statement;
8. Submission, approval, implementation of Tree Protection Plan;
9. Submission, approval, implementation of Construction and Environmental Management Plan (CEMP);
10. Submission, approval, implementation of updated Ecological Assessment;
11. Submission, approval, implementation of any phase 2 surveys required by the updated Ecological Assessment;
12. Submission and approval of updated Biodiversity Net Gain Assessment;
13. Submission, approval, implementation of Habitat Management and Monitoring Plan (HMMP);
14. Submission, approval, implementation of lighting details;
15. Submission, approval, implementation of detailed surface water drainage scheme;
16. Record of the installed SuDS and site wide drainage scheme to be submitted and approved
17. Submission, approval, implementation of public art details;
18. Submission, approval, implementation of community employment plan;
19. Submission, approval, implementation of remediation strategy and verification report in relation to contaminated land;
20. Should previously unidentified contamination be found, construction work must cease until a remediation strategy is provided;
21. Submission, approval, implementation of scheme for managing boreholes;
22. No drainage system utilising the infiltration of surface water to the ground shall be installed, unless in accordance with a scheme which has been submitted and approved;
23. Implementation of the Geological Conservation Management Plan;
24. Provision of access to quarry face for vegetation clearance and collection of material for scientific purposes;
25. Submission, approval, implementation of full details of access and footway/cycleway;
26. Submission, approval, implementation of full details of off-site highways works;
27. Development to not be occupied within a phase until connection to the foul water drainage system has been secured;
28. Development to not be occupied within a phase until connection to the water supply system has been secured;
29. Submission, approval, implementation of Construction Traffic Management Plan (CTMP);
30. Submission, approval, implementation of Framework Travel Plan;

31. Submission, approval, implementation of Cycle Parking details;
32. Submission, approval, implementation of vision splay details;
33. Off site highways works to be completed prior to occupation; and
34. Submission, approval, implementation of detailed noise and dust assessments based on detailed design.

### **Compliance with National Planning Policy Framework**

In accordance with paragraph 39 of the NPPF Oxfordshire County Council takes a positive and creative approach and to this end seeks to work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. We seek to approve applications for sustainable development where possible. We work with applicants in a positive and creative manner by;

- offering a pre-application advice service, as was the case with this application, and
- updating applicants and agents of issues that have arisen in the processing of their application, for example in this case the application was significantly amended following feedback from the initial consultation, in particular concerns about the landscape and visual impact of buildings of the scale originally proposed in this location.

## **Annex 2 - Section 106 Heads of Terms**

1. Transport contributions i) £574,213.08 towards bus services, ii) £21,154.00 towards bus service infrastructure iii) £3,265.00 towards Travel Plan monitoring.
2. Rights of way contribution – £65 000 towards surface and infrastructure improvements within c2km of the site.
3. HMMP monitoring contribution.
4. Implementation of the management strategy for the quarry walls, including access to the geology by prior arrangement and education/interpretation provision.
5. Commitment to undertake the proposed works to highway to deliver the active travel improvements under a s278 agreement.

The applicant has confirmed that they agree in principle to these requirements.

## Annex 3 – Consultation Responses Summary

### Vale of White Horse District Council - Planning

#### Final Response

##### 1. Ecology

There has not been sufficient time to review the detailed technical information. Suggest comments from the County Ecologist are considered.

##### Landscape

The scale and form of the proposed development remain at odds with the rural landscape character at the edge of the town. The specific points previously raised have however now been addressed.

#### Sixth Response

2. Heritage Officer - The additional planting in the south-eastern corner of the site would help to mitigate the impact on the setting of the grade II listed Old Barn and adjoining granary, and the previously discussed non-designated heritage assets. To effectively screen the development from views of the listed building and thereby preserve the rural character of its setting, the detailed design of the proposals would need to utilise roof forms, materials and/or lighting design complementing detailed landscape proposals that would make for a camouflaged development in views from the vicinity of the listed building. I am satisfied that the amended parameter plan could achieve this. The following amendments would still be required to the Design Code:

- Light colour materials should be reserved for the ground floor of buildings. Upper stories should be of the top cladding examples as on page 28 of the Design Code. Elevations Buildings up to 12m Variation 1 should be removed or replaced with full elevations of the top cladding options.
- Roofs should be predominantly green allowing for solar panels in locations to be determined at reserved matters stage.
- Full elevations of glass should be avoided. This will require removing some of the examples on page 29.

3. The form and scale of the proposals is discordant with that of the market town of Faringdon or its rural surroundings. These amendments are also therefore necessary to minimise the obtrusiveness of the development in views; to and from the grade II listed Folly which contribute to its significance as a viewing point, and which enable appreciation of the character and significance of Faringdon Conservation Area as a historic market town. They should be made alongside layout and landscape amendments in accordance with the landscape officers comments to minimise the impact on their significance.

4. Ecology Officer - I have reviewed this application again. Since my previous response (under S&V application response P25/V1335/CM) a revised biodiversity net gain (BNG) calculation has been submitted, supported by a further revision to the Biodiversity Net Gain Framework Plan, Biogenia dated September 2025) and the Landscape & Ecological Mitigation and Enhancement Plan (Landmark Trust Rev H, undated). These presumably now reflect the revised habitat areas in the amended landscape design. It also broadly, but not entirely, addresses the issues I previously raised with the achievability of proposed enhancement and creation actions. There are some outstanding issues. Specifically:

1. The BNG baseline has now been simplified to just one version, with the previously supplied post restoration baseline calculation not having been updated. The current onsite baseline calculation as updated is presumed now to be the only version for consideration. I have no strong views about this, but it has nullified a previous discrepancy in the former calculation regarding the type of agricultural land present on site.
2. The proposed woodland enhancement and creation have been amended to deliver Other Woodland, Broadleaved in Good condition. This is a more realistic habitat type than the previously proposed (and higher-value) Lowland Mixed Deciduous Woodland. However, in my view the targeted condition score is still too optimistic. This is because achieving Good condition requires the woodland to develop at least some characteristics that take a very long time to develop (such as a complex structure with excellent natural regeneration, a species-rich ground layer vegetation community with ancient woodland indicator species, extensive standing and fallen deadwood and presence of veteran or ancient trees). These are unlikely to be achieved in the 30-year BNG timescale, and this is reflected by a warning in the creation and enhancement tabs. I recommend that the applicant is made to change the achieved condition to Moderate. Additionally, the enhancement of woodland is still shown as having been started 5 years in advance, with no obvious justification having been provided for this and no evidence that the targeted management techniques needed to uplift woodland condition have been commenced. In my view the current state of the woodland on site should be treated as the base point and use of this multiplier should be avoided.
3. The proposed enhancements to create woodland from different broad habitat types have been removed, but the applicant is still seeking to create ponds from scrub. Justification for this has been provided (the scrub is on the site of former ponds created during the quarry restoration but which were unsuccessful and did not hold water) but treating this as an enhancement rather than loss and replacement is still technically not in line with the User Guide to the Statutory BNG metric. I defer to the County Ecologist's view as to whether this is of concern. The pond enhancement is also erroneously shown as being commenced 5 years ago again, I can see no evidence that this is the case.

4. The LEMEP has now reverted to not showing the superbloom treatment as per previous iterations, and the calculator now shows that Other Neutral Grassland in Good condition will be created through the centre of the site, not Lowland Meadows . This is a more realistic habitat classification, but in my view the proposed Good condition is relatively unlikely to be achievable, due to the concentration of this grassland in high-traffic areas (Green Infrastructure corridor) between the buildings and the extensive tree planting in this area (which incidentally does not seem to have been included in the metric). These factors are likely to complicate the traditional hay meadow management required to achieve Good condition and to limit condition of large areas via shading. In my view this grassland is only likely to achieve Moderate condition.

5. The baseline metric does not incorporate any ponds, now justifying this by arguing that proposed ponds in the quarry restoration programme have not been successful and have become dominated by scrub. This does not entirely agree with previous consultation responses from myself and others noting standing water onsite at different times. I defer to the county ecologist's view on whether ponds are present or not and therefore whether any standing water habitats should be included in the baseline habitats.

5. Landscape Architect – The energy centre has been relocated from the north eastern corner of the site, allowing more space for planting, however there is still a lack of depth available for planting on the eastern boundary to the rear of building 4, and the perimeter strip is still shown as swale and landscape screen; these are incompatible and should be shown separately as noted in previous comments. The parameter plan shows no increase in the 11m width shown in the previous proposals in this part of the eastern boundary, although additional space is shown in the southern section, and a slight increase on the north east corner. I am concerned that most of the 11m strip could be taken up by a swale, with little space left for the necessary tree belt planting. This also applies to the eastern part of the northern boundary. Screening on these site boundaries is important due to the elevated views from Faringdon Folly.

The Design Code refers to a maximum building footprint of 50% of the development area, this is not stated on the parameter plan. This should be secured as part of any outline permission.

Design Code refers to car parking decks limited to 12m height (pages 12/13), whilst also showing smaller buildings opposite the bridleway, to maintain openness; the masterplan no longer shows decked car parks. Please confirm that there will be no decked car parks and amend the Design Code accordingly. The Design Code states that there will be office pod structures (page 15), within an area in the western site shown as a landscaping/screening zone on the parameter plan, and not within the area shown as developable zone. Please amend the Design Code accordingly.

The following also need to be amended in the Design Code:

Green roofs should be used predominantly to limit the adverse effect on elevated views from Faringdon Folly.

There should be no large areas of glazing facing the rural area or apparent in views from Faringdon Folly. Glazing should not extend to the full height of the buildings, contrary to examples shown in the Design Code page 29.

There should be no pale coloured building materials on the upper parts of the buildings; these should be restricted to the ground floors where they will be filtered by vegetation (omit variation 1).

### Conclusion

The scale and form of the proposed development would remain at odds with the rural landscape character at the edge of the town. The parameter plan still does not indicate that there would be adequate space for landscape mitigation, sufficient to screen and assimilate the proposals in the long term, on the boundaries of the north eastern part of the site, as noted above.

There are contradictions between the Design Code and the Illustrative Masterplan and Parameter Plan; the Design Code needs to be updated and amended as set out above, and should be secured as part of any outline planning permission.

### *Fifth Response*

6. Heritage Officer - The area of additional planting proposed is insufficient to effectively screen the development, therefore previous comments remain.
7. Ecology Officer - Layout has changed somewhat in response to comments from the County Landscape Officer and a revised Landscape and Ecology Masterplan has been submitted. The substantive changes appear to be the removal of a multistorey/ deck car park, the minor relocation of buildings 4 and 4 and minor strengthening to landscape buffer planting. No objection to this change but a revised version of the biodiversity net gain (BNG) calculation has not been provided to incorporate these changes, meaning the BNG information is now inaccurate in terms of the extents of proposed habitats. The significant issues with the classification and condition assessment of habitats raised in previous response has not been addressed. A revised and substantially more realistic BNG calculation needs to be provided prior to determination. Updated LEMP refers again to the 'superbloom' treatment through the centre of the site – a landscape typology which was previously removed. Previous comments highlighting the inappropriateness of claiming this habitat as 'lowland meadows' in the BNG calculation still apply. 'Introduced shrubs' or 'vegetated garden' is a more realistic classification.
8. Forestry Officer - Previous comments remain valid.
9. Landscape Architect - Amendments have been made to the parameter plan and illustrative masterplan to include a peripheral landscape strip. Whilst this is shown as around 10m wide on the parameter plan the masterplan indicates that this will

partly be taken up by a swale. It seems that it will only allow for a single line of trees on some boundaries which will not be adequate to screen the development, particularly in elevated views. Further clarification of the depth of the planting strip proposed required, separate to any space required for the swale. The parameter plan does not show the linear park in the centre of the site which is important as it allows for large tree planting within the site which will help to screen and assimilate the development in the longer term, particularly in elevated views. Whilst the Design Code refers to the linear park and a maximum building footprint of 50% of the area, these need to be secured as part of the outline permission through the parameter plan. The car park at the south-eastern corner of the site on the rural edge has been retained and this is not appropriate in this rural location. The scale and form of the proposed development remains at odds with the rural landscape character at the edge of the town and the parameter plan does not indicate that there would be adequate space for landscape mitigation sufficient to screen and assimilate the proposals in the long term.

#### *Fourth Response*

1. Cllrs Foxhall and Patel (Watchfield and Shrivenham) – Updates appear to be corrections to documents that were outdated following an earlier reduction in floorspace and height, therefore comments stand unchanged. [*N.B. In fact this consultation related to a further reduction in floorspace and height.*] Would like to highlight some further points: Faringdon Neighbourhood Plan only makes provision for Class B2 and B8, not the additional Class E applied for. Great Crested Newts have been recorded at the site. Additional weight should be given to the VOWH's Landscape and Heritage officers' comments, as in normal circumstances this application would fall to VOWH to determine.
2. Heritage Officer – The reduction in height to 12m is an improvement to the scheme, making the proposed buildings lower in relation to the historic farmstead and landscape. The large building footprints, urban forms and lighting, however, remain at odds with the rural landscape character. The urban form of the buildings is of stark contrast to the rural edge of the town. Proposals rely on planting outside the site to screen the development, which will not prevent views, particularly in the autumn/winter months and is not in the control of the site. Additional planting within the site is necessary to mitigate visual impacts. The urbanising impact of light spill, would prevent visual impact being entirely mitigated. Development would be visually intrusive and have adverse effects on views from the tower and on the setting of Faringdon and Great Coxwell. Recommend roof materiality as an element in the design guide, to ensure that light and shiny materials creating glare, including solar panels, are avoided. Also consider that the proposal would affect the setting of Faringdon Conservation Area as a rural market town viewed from the Folly. Subject to the suggested

amendments to planting and roof materials, the proposals would have a less than substantial impacts on the significance of adjacent buildings, on the significance of the Folly and Faringdon Conservation Area. This should be weighed against the public benefits in line with paragraphs 215 and 216 of the NPPF.

3. The proposal does not comply with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, due to impacts on the setting of listed building Old Barn, and views from the listed Folly. It is considered to fail to meet the tests of NPPF paragraphs 212, 213 and 219 and policies CP39 and DP36-38 of the Local Plan.
4. Landscape Officer – Whilst the reduction in building height to 12m would allow the buildings to sit lower in the landscape, the large building footprint and urban form remains unchanged, and is still at odds with the rural landscape character, with the development remaining incongruous and intrusive. Light spillage would further add to the adverse effects on character and views. No significant planting is proposed on the perimeter of the built development and the proposals largely rely on vegetation outside the site, particularly in the eastern part of the site. Mitigation should be provided within the site. The proposed development is immediately adjacent to a valued landscape, forming part of a candidate Local Landscape Designation as set out in the Local Landscape Designation Review 2024. Views from the bridleway would be compromised, views from Folly Tower would remain open where there are gaps in vegetation. Concerned about solar panels on roofs, pale building materials and light spillage. A green infrastructure parameter plan would be required to secure the linear green park shown on the illustrative masterplan. Conclude there would be some conflict with Local Plan Core Policies 37 and 44, Development Policy 29 and policies 4.5b and 4.7e of the Neighbourhood Plan.
5. Air Quality – The AQ Assessment does not take into consideration the councils' AQ Guidance for Developers and does not include information on whether the best practice design features outlined in this document will apply to the proposed development. Recommend conditions for electric vehicle charging points and secure cycle parking storage.
6. Forestry Officer – Satisfied that the trees requiring removal for the site entrance are correctly categorised. Condition should be applied as required by OCC Tree Officer for updates to the AMS and TPP to reflect any future changes to layout. Agree that removals should require significant replanting of trees, including additional landscaping to the east of the site but also at the entrance. Remain concerned about loss of H2 which does not appear necessary.
7. Ecology Officer – Submitted documents contain inconsistencies and unrealistic proposed habitat assumptions. Although the latest changes relate to building height and do not have ecological implications, there remain a number of issues with the BNG metric that should be addressed prior to determination including the classification of existing grassland, realistic aims for woodland enhancement and

grassland. Inconsistency in relation to waterbodies currently on site should also be addressed.

*Third Response*

8. Cllrs Foxhall and Patel (Watchfield and Shrivenham) – Earlier comments continue to apply as the current changes relate to the earlier reduction in building height. Would like to add further comments on biodiversity. Do not believe the application is compliant with BNG policy, as set out in consultation responses from BBOWT and the Ecology Officers at OCC and VOWH.
9. Heritage – Comments remain largely the same as before. The proposed parameter plans and design code are insufficient to determine whether there would be harm to the setting of heritage assets. The urban form of the proposals would be a stark contrast to the rural edge to the town as experienced from Lord Berners Folly, Faringdon Conservation area, Wicklesham Lodge Farm and undesignated assets. As submitted, the proposals by virtue of their scale fail to preserve or better reveal the contribution that the rural and agricultural setting of the identified heritage assets makes to their significance. Harm is therefore identified, and this must be appropriately weighted as per the NPPF and Local Plan policy requirements.
10. Ecology – Scheme appears unchanged other than building heights. PEA is the same, so comments substantively the same as previously, although the response of the applicant to the OCC Ecology comments and the BNG calculations provide useful context. In my view is that the ecological supporting information remains deficient in some aspects, particularly biodiversity net gain (BNG). Detailed comments provided on designated sites, habitats, BNG, reptiles and great crested newts.
11. Forestry – Information on tree removals has now been provided. Overall consider that the removals are still amply shown as mitigated by the landscape proposals. Though these would need to be secured. Some losses are not sufficiently justified at present, including those associated with the adjusted site entrance. The re-design of the junction seems to have been led by a highways focus without due consideration to arboricultural constraints. A more detailed assessment is necessary and further justification should be made for some of the removals, or changes should be made to facilitate their retention. Would support a refusal, but if permission were granted then conditions should be applied for an updated Arboricultural Method Statement & Tree Protection Plan and for the submission of a detailed landscape and planting plan.
12. Landscape – There are some additional individual trees indicated to the perimeter of the buildings in the eastern part of the site at quarry base level. These would not mitigate the adverse impact and would take a long time to mature. Previous comments still apply. The scale, height and urban form of the proposed

development would remain completely at odds with the rural landscape character and with the adjacent edge of town, the development would be visually dominant and intrusive, resulting in significant adverse effects on the landscape character and views, and on the setting of the town. There would be significant adverse effects on important views to and from Faringdon Folly.

### *Second Response*

13. Cllrs Edwards and Thomas – Welcome suggested changes to the building height and provision of an arboricultural management plan. However, there is still need for further improvements. Believe that the proposed junction will increase disruption to the normal flow of the A420. Exit from site should be located onto the existing Park Road roundabout. Welcome the site as a source of employment, but believe it would add pressure to highways. Request for a footbridge has been sidestepped by a discussion about an extended bridleway.
14. Cllrs Foxhall and Patel (Watchfield and Shrivenham) – The minimal changes proposed do not materially change the application and do nothing to address impacts on traffic, ecology, local plan adherence, impact on landscape, highways and access and sewerage and water infrastructure. Concerned about setting a precedent for industrial development in the rural Vale, the visual impact, highways and access, ecology, trees, geodiversity, sewage infrastructure.
15. Conservation Officer – Previous comments largely still apply. The LVIA has been updated and notes designated heritage assets. The updated Design Code seeks to protect a long landscape view of Faringdon Folly from the bridleway, but reducing overall building heights. Despite this, built form of this scale would be alien in the landscape. Preservation of a single view cone makes little difference to the overall impact of the development. No further discussion of the relationship between the proposed development and the Grade II listed barn and adjoining granary.
16. Ecology – The applicant should provide pond creation as a suitable enhancement, as part of the habitat creation scheme. Not enough information has been provided to confirm that the proposed BNG can be delivered.
17. Forestry – An Arboricultural Impact Assessment, Tree Protection Plan and Arboricultural Method Statement should be sought. However, unlikely to object as few trees would be removed and a large number of trees would be planted.
18. Landscape – Previous comments largely still apply. The photomontages demonstrate that the reduction in building height would make limited difference to the landscape and visual impact, due to the nature of the views. The scale, height and urban form would remain at odds with the rural landscape character and the development would be visually dominant and intrusive. There would be significant adverse effects on important views from Faringdon Folly. The dark coloured

buildings are unlikely to merge into the background when viewed from the Folly in reality. Internal and external lighting would add to the adverse impact.

*First Response*

19. The site is not allocated in the VLP. The site is safeguarded in the FNP. The County Council needs to satisfy itself that quarrying is complete and aftercare has been completed, there are no other suitable sites closer to the town centre available, there is a demonstrable need for the development, the criteria of the policy are met and permitted uses are restricted to Use Classes B2 and B8.
20. The large scale, height and form of the buildings would be completely at odds with the rural landscape character. There would be significant adverse effects on views to and from Faringdon Folly, loss of amenity to the Vale Way long distance path. Proposals would be contrary to VLP Core Policies 37 and 44 and Development Policy 29. They would also conflict with FNP policies 4.5b and 4.7e.
21. The proposals fail to preserve or better reveal the contribution of the rural and agricultural setting to heritage assets, contrary to VLP Development Policies 36, 37 and 38.
22. Should permission be granted, appropriate provision for pedestrians and cyclists must be secured, including links to the northern side of the A420, specialist advice should be sought on impacts on the geological significance of the site, there should be biodiversity net gain and conditions should be applied to clarify specified uses and secure public art and a community employment plan.
23. There is a risk of surface water flooding through the centre of the site from the southwest corner. The County Council should satisfy itself that adequate capacity would be available to accommodate wastewater.
24. District Cllrs Foxhall and Patel (Watchfield and Shrivenham) - Concerned about the scale and proximity to the rural Vale. The site is not allocated in the Vale Local Plan, the site is an SSSI and the Faringdon Neighbourhood Plan requires the protection of landscape, wildlife, geology and the provision of safe access. Would set a precedent. No other village or town in Oxfordshire has been allowed to straddle the A420. Amenity impact on rural villages. Site is green field. Concerned about height of buildings, access arrangements and Great Crested Newts. Faringdon Sewage Treatment Works does not have capacity and should be upgraded prior to any further development.
25. District Councillors Edwards and Thomas (Faringdon) – Object. The proposed signalised crossing would cause more disruption in a congested area, a foot/cycle bridge would be preferred. Improvements should be made to intersections to mitigate impact of increased traffic volumes. Consideration should be given to public transport and bus routes. The height of the buildings should be significantly reduced to remedy landscape impacts. Would like to see ecological mitigation to ensure significant biodiversity net gain. Access must be provided for scientific study. Overall, the proposal does not meet the criteria set out in FNP policy 4.5B.

26. Ecology Officer - The biodiversity net gain calculation provided in the ecology report is considered to be unlikely to be achieved and cannot be verified as the calculations have not been provided. These should be requested. Although the risk of reptile presence is low, consideration should be given to asking for a survey and mitigation proposals. Accept that the former ponds have dried and been invaded by scrub, however Great Crested Newts are long-lived and could still be present. At least one of the ponds should be re-instated as an enhancement measure.

### **Vale of White Horse District Council – Environmental Protection**

*Seventh Consultation (September 2025)*

27. Confirmed no additional comments to make.

*Fifth Consultation (June 2025)*

28. Confirmed no additional comments to make.

*Second Consultation (May 2024), Third Consultation (October 2024) and Fourth Consultation (May 2025)*

29. Responded with the same comments as previously made.

*First Response*

30. No significant objections at this stage, subject to further information including mitigation measures and specific uses for the site, being provided as part of the full application.
31. Unable to provide detailed feedback due to the flexible potential uses of the site at outline stage. However, the Noise Impact Assessment highlights that noise from changes in road traffic, fixed plant associated with the development, break out noise and additional activities will need to be considered in greater detail when further information is available. The full application should also consider impacts from construction noise and dust on nearby noise sensitive receptors, as part of a construction management plan.

### **Vale of White Horse District Council – Contaminated Land**

32. Contaminated Land – The content of the submitted report satisfactorily addresses the requirements for a Phase 1 preliminary risk assessment. Potential sources of ground contamination have been found and intrusive investigations are now required. Therefore, conditions should be attached to cover this.

### **Faringdon Town Council**

*Final Response*

33. This development will increase the prosperity and vitality of Faringdon by providing much-needed, high quality employment opportunities for local residents thereby reducing the necessity for commuting. Biotechnology and life science is specifically mentioned as a growth area in the Government's proposals for the revision of the NPPF and a development such as this could create a focus for attracting more businesses to Faringdon.
34. The proposal is in accordance with Policy 4.5B of the made Faringdon Neighbourhood Plan (and, therefore, part of the current Local Plan) which contains specific caveats to protect the unique quarry walls and require them to be accessible to geologists and students of geology.
35. Unfortunately, the emerging Local Plan has no proposals for the development of Faringdon to complement the 83% increase in housing that has occurred over the last 25 years and, as a result, the working age population is overwhelmingly employed elsewhere. It should be noted that Faringdon has no other large-scale employment sites available that would be in accordance with local policies.
36. In accordance with planning obligation legislation, Faringdon Town Council request an appropriate level of developer funding to (1) help support the town centre and visitor economy and (2) enable the provision of sports/leisure/recreation facilities.

#### *Sixth Response*

37. This development will increase the prosperity and vitality of Faringdon by providing much-needed, high quality employment opportunities for local residents thereby reducing the necessity for commuting. Biotechnology and life science is specifically mentioned as a growth area in the Government's proposals for the revision of the NPPF and a development such as this could create a focus for attracting more businesses to Faringdon.
38. The proposal is in accordance with Policy 4.5B of the made Faringdon Neighbourhood Plan (and, therefore, part of the current Local Plan) which contains specific caveats to protect the unique quarry walls and require them to be accessible to geologists and students of geology.
39. Unfortunately, the emerging Local Plan has no proposals for the development of Faringdon to complement the 83% increase in housing that has occurred over the last 25 years and, as a result, the working age population is overwhelmingly employed elsewhere. It is likely that should this application fail, this site will be proposed for housing development thereby contributing to Faringdon's decline as a sustainable community.
40. In accordance with planning obligation legislation, Faringdon Town Council request an appropriate level of developer funding to (1) help support the town

centre and visitor economy and (2) enable the provision of sports/leisure/recreation facilities.

*Fifth Response*

41. This development will increase the prosperity and vitality of Faringdon by providing much-needed, high quality employment opportunities for local residents thereby reducing the necessity for commuting. Biotechnology and life science is specifically mentioned as a growth area in the Government's proposals for the revision of the NPPF and a development such as this could create a focus for attracting more businesses to Faringdon.
42. The proposal is in accordance with Policy 4.5B of the made Faringdon Neighbourhood Plan (and, therefore, part of the current Local Plan) which contains specific caveats to protect the unique quarry walls and require them to be accessible to geologists and students of geology.
43. Unfortunately, the emerging Local Plan has no proposals for the development of Faringdon to complement the 83% increase in housing that has occurred over the last 25 years and, as a result, the working age population is overwhelmingly employed elsewhere. It is likely that should this application fail, this site will be proposed for housing development thereby contributing to Faringdon's decline as a sustainable community.
44. In accordance with planning obligation legislation, Faringdon Town Council request an appropriate level of developer funding to (1) help support the town centre and visitor economy and (2) enable the provision of sports/leisure/recreation facilities.
45. This development will increase the prosperity and vitality of Faringdon by providing much-needed, high quality employment opportunities for local residents thereby reducing the necessity for commuting. Biotechnology and life science is specifically mentioned as a growth area in the Government's proposals for the revision of the NPPF and a development such as this could create a focus for attracting more businesses to Faringdon.

*Fourth Response*

46. This development will increase the prosperity and vitality of Faringdon by providing much-needed, high quality employment opportunities for local residents thereby reducing the necessity for commuting. Biotechnology and life science is specifically mentioned as a growth area in the Government's proposals for the revision of the NPPF and a development such as this could create a focus for attracting more businesses to Faringdon.

47. The proposal is in accordance with Policy 4.5B of the made Faringdon Neighbourhood Plan (and, therefore, part of the current Local Plan) which contains specific caveats to protect the unique quarry walls and require them to be accessible to geologists and students of geology.
48. Unfortunately, the emerging Local Plan has no proposals for the development of Faringdon to complement the 83% increase in housing that has occurred over the last 25 years and, as a result, the working age population is overwhelmingly employed elsewhere. It is likely that should this application fail, this site will be proposed for housing development thereby contributing to Faringdon's decline as a sustainable community.
49. In accordance with planning obligation legislation, Faringdon Town Council request an appropriate level of developer funding to (1) help support the town centre and visitor economy and (2) enable the provision of sports/leisure/recreation facilities.

*Third Response*

50. Confirm that previous comments still apply.

*Second Response*

51. Support the application as it stands. Suggest adjustments to mitigate the impact on the town. Access should include an exit on the existing roundabout. All traffic mitigation should be installed before construction begins. A pedestrian and cycle bridge is essential to safety across the A420. Strongly support the recommendation for a second crossing at Sands Hill. Reducing the building height further to 15 m would further mitigate the impact on the surrounding landscape. Any buildings without solar panels should have a living roof installed to increase biodiversity.

*First Response*

52. Object on the grounds that the current proposals do not conform with Faringdon Neighbourhood Plan policy 4.5B, as the criteria are not met.
53. The proposed access with right turning into the site eastbound is unacceptable in mixing motorised and non-motorised traffic. Vehicles should enter via the Park Road roundabout as now. Right turning egress could result in traffic jams as in Milton Park at peak periods. The proposed Toucan crossing may not be adequate for the current traffic volumes at peak periods. It was expected that pedestrian crossing to the site would be from the bridleway between Sands Hill and Quarry Hill, but the application site does not have an entrance in the NW corner. Recommend that the only safe and acceptable access for non-motorised traffic is via a bridge from the Sands Hill bridleway.
54. The 25 metre building height is contrary to policies 4.7A and E. Buildings should be no higher than two stories or 15 metres. Massing is also a concern, the size of the buildings should be reduced.

55. Access to the SSSI should be permanent and not restricted by site security. There should be adequate Fencing and indefinite maintenance. There should be a Section 106 agreement for an educational facility to disseminate information about the Faringdon fossils. There is also the opportunity for the provision of sports pitches as this is the only piece of flat land left undeveloped in Faringdon.

## **Great Coxwell Parish Council**

### *Final Response*

56. Object. Concerned about traffic, visual amenity and overall character of the area. Not in accordance with VOWH's spatial strategy. Would disrupt local traffic flows and impact the local character and landscape. Major employment site outside the local plan. Access inadequate. Traffic modelling provides little reassurance. Impact of the development pushes Great Coxwell junction over capacity by 2030.

### *First Response*

57. Object on basis of safety of the access and traffic impact. Will limit comments to site access, as all other matters are reserved. The A420 between the Faringdon roundabout and Coxwell turn is busy and relatively dangerous. The proposed access is not suitable. The site was not considered for such development in the Vale Local Plan. The increase in traffic have not been considered in relation to other development in the area. Effects on traffic will be exacerbated by allowing pedestrians to cross. Safe pedestrian access must be provided, but should not disrupt traffic, for example an overpass. Road access would seem more sensibly provided by the adjacent roundabout.

## **Little Coxwell Parish Council**

### *Final Response*

58. Little Coxwell Parish Council strongly objected to this application back in July 2023 and these objections are still valid throughout all of the latest updates and changes. However, we would like to comment on the latest documents presented; The document from Thames Water is extremely alarming and shows that they have some major concerns over the impact on the infrastructure of this application. Little Coxwell has already seen a deterioration of its water supply since the introduction of the new housing in Faringdon, as our supply is gravity fed and not pumped. So clearly, a major development such as this will impact us further and a major infrastructure review programme, including both water supply and sewerage, needs to be undertaken for this application. To us, this makes it unviable and another example of further impacts on the community for what we believe is an unnecessary development. We, and others have strongly argued that it is the WRONG development in the WRONG location and should

be rejected. This development is not necessary and is purely financial for a small group of individuals, and the cost to the environment, wildlife, traffic and the wider community of Faringdon is too great. It has also been a great strain on the planning process for an 'Outline planning application' that the applicant, OCC Planning and all of us know will never be built and we will end up with something else that is of no benefit to the community and cause the loss of a SSSI site and most importantly the wildlife that enjoys the space at the moment.

### *Third Response*

59. Strongly objects. **The updated Application Form, Design and Access Statement, Sustainability Statement, and Design Code**, - all seem to be updates due to the reduction in floorspace from 42,286 sq mtrs to 33,592 sq mtrs.

However, this is highly misleading. There is no reduction in the footprint of this application from the original submitted, and this latest documented reduction is as a result of the reduced height defined in the changes submitted back in May 2024. Why weren't the changes made then, as it was clearly known that a reduction in height and the removal of a whole floor of rentable space would lead to an overall reduction in floorspace. Our belief is that the applicant wants to show responses to continued objections to this development, by showing firstly a reduction in height and then a reduction in floorspace when they are one and the same thing.

This example of continuing to frustrate the planning process and the public is further evidenced by this statement that we found in the Sustainability Statement;

"Buildings have been designed at this early stage to have large floor to ceiling heights that will accommodate uses such as industrial production but that can also be broken down into multiple levels of laboratory floor space or even offices, depending on the required use. This not only means that a multiple of tenants can be sought for the site, but that building uses can easily changed beyond that first tenant."

It shows that this is not a "Life Sciences" development (a marketing statement) but an industrial development for rent to the highest bidder for whatever use they require, even beyond those classifications defined in the application.

### **Biodiversity Net Gain Assessment (updated)**

This is a highly complex data analysis that we do not have the software and tools to question its validity but its findings are clearly flawed and misleading.

The changes seem to indicate that there is an increased Biodiversity Net Gain as a result of this proposed development. This makes no sense and common sense tells you that there will be a major biodiversity reduction from this huge development. The site is currently isolated from human intervention as there is no access, so it will be used by a huge variety such as Owls, bats and all sorts of animals, insects etc for hunting etc whilst living in the surrounding woods and land so no amount of introduced trees and hedgerows will compensate for this loss. I see no where in the calculations accounting for this huge loss of biodiversity?.

The modified Arboricultural Assessment document also states;

"36 trees will need to be removed in order to construct the proposed development" also "One C-grade hedgerow will also need to be removed to make space for a new pedestrian access route."

This is a change from 4 trees to be removed, from the original document  
It also states;

“The widening of the access junction connecting to the A420 will require the removal of Highway trees either side of the existing access onto the A420.”

So clearly there is a much larger tree removal process defined in these new documents that does not appear to have been factored into the Net Gain Bio Diversity calculations and needs professional scrutiny.

#### **Landscape and Ecological Mitigation and Enhancement Plan (LEMP) (updated)**

– there is no ‘superseded’ document to compare?

**Technical Note 4 – Addendum to Transport Assessment (new)** – this again is a complex document with detail that it is from proprietary software that we do not have the skills to analyse. However, the conclusions again do not make sense based on todays experiences of traffic flows in the area without this large development and increased traffic flows that will inevitably ensue. It states;

“The Park Road roundabout would also remain within capacities.”

This is laughable, as today at the Park road roundabout at peak travel times the queues along park road and up and down the A420 are huge before any introduction of a major development as this?

Again, these calculations and conclusions need professional scrutiny.

From a Little Coxwell Parish perspective, this document confirms our worst fears for the Fernham road junction onto the A420, it states;

“The results of this assessment reveal that the junction is currently experiencing delay for traffic emerging from the minor arm, which is expected to worsen in the reference case with the addition of committed development to a point where it fails in the PM peak with no traffic able to emerge safely from the minor arm, Fernham Road.”

We therefore reiterate our original objections and this new document confirms them.

**Technical Note 4 – Appendices (new)** – this appears to be the detail to the above new document?

**Arboricultural Impact Assessment (updated)** – the statement within the first page of this document states “ Arboricultural advice was taken early in the planning process”

However, this amended document goes onto advise “ To construct the proposed development, 36 trees will need to be removed in order to construct the proposed development “

This is a change from the original document “ 4 trees will need to be removed in order to construct the proposed development”.

How has this much larger volume of tree removal happened and not been part of the original application and continues to show the increased impact of this major development.

The updated document adds in an additional visit date of the 24<sup>th</sup> of August 2024 and revises the number of trees surveyed from the original document of 33 trees and 5 hedgerows to 75 trees and 5 hedgerows. Again, why wasn’t the number of trees surveyed at the outset not included and how do we know this is the correct number and a number haven’t been omitted?

The modified document also states;

“36 trees will need to be removed in order to construct the proposed development” also “One C-grade hedgerow will also need to be removed to make space for a new pedestrian access route.”

This is a change from 4 trees to be removed, from the original document.

This is a significant omission and change from the original submission and does not list the number of trees to be planted and only states “ The loss of trees will be compensated by an extensive programme of new tree planting, which has been designed to provide robust green infrastructure. “

How can we be confident in this new planting?

**Arboricultural Method Statement (updated)** – the only difference seems to be a new drawing advising the trees requiring the cellular confinement system?

**Letter regarding power to the site (new)** – LC Parish Council has no comments

**Technical Note – Landscape (new);**

1) there is much comparison with the Oriel Gardens development and using this as an excuse for the visual impact. Oriel Gardens is on the ‘town’ side of the A420 and hence the visual impact is not so severe on the countryside views

2) one of the comments in this document is about light spillage, especially at night. No comments have been made on the harmful light pollution for wildlife?

**Amended Visualisations (new)** – This is a new document with photographs from various places including the folly and the public rights of way. It is clear that the views from the PRoW's will be impacted by this large development, and the attempt to show a photograph from almost ground level rather than head height shows what lengths the applicant is prepared to go to mask the impact of this development will have on the views of the surrounding PRoW's

The documents that we have reviewed and commented on do nothing to mitigate the issues raised, in fact they re-enforce our original objections that we have originally made for this highly unnecessary application.

In fact, due to the nature of these modified and new documents that have been submitted we further object on the grounds of Policy M10 - ‘Restoration of mineral workings’ of the ‘Minerals and Waste Core Strategy’ - it states:

**“Mineral workings shall be restored to a high standard and in a timely and phased manner to an after-use that is appropriate to the location and delivers a net gain in biodiversity.”**

The restoration and after-use of mineral workings must take into account, amongst others:

- **the characteristics of the site prior to mineral working;**
- **the character of the surrounding landscape and the enhancement of local landscape character;**
- **the capacity of the local transport network;**
- **the quality of any agricultural land affected, including the restoration of best and most versatile agricultural land;**
- **the conservation of soil resources**
- **any environmental enhancement objectives for the area;**
- **the conservation and enhancement of biodiversity appropriate to the local area, supporting the establishment of a coherent and resilient ecological network through the landscape-scale creation of priority habitat;**

### *Second Response*

60. Strongly object. The amendments do nothing at all to address previous concerns raised, which are repeated. It would still be development on agricultural land and an SSSI which is not in accordance with the VOWH Local Plan and is in excess of the employment needs for Faringdon, and would result in transport chaos.

### *First Response*

61. Major areas of concern include the impact of such a large development on traffic. The proposed mitigations are inadequate. The development would lead to more traffic on the A420 and the introduction of traffic lights for pedestrian access will exacerbate the situation. Site is agricultural land and development is speculative. The SSSI should be protected. Concerned about impacts on biodiversity. Does not meet the requirements of FNP policy 4.5B in relation to landscape. This development would not have the benefits for Faringdon envisaged. The majority of employment will come from outside the area and it will not benefit the town centre. No other settlement along the A420 has been allowed to straddle it. Application should be refused. Recognise the land is safeguarded for employment in the FNP, but this proposal is much larger than was envisaged and does not meet the criteria.

### **Longcot Parish Council**

62. Object. Concerned about huge increase in traffic. There appears to be no way to ensure the safety of the A420. Would like to know how the roads would be kept safe. The plan to use the roundabout will cause queues at an already busy roundabout. Concerned about increase in air pollution. Excellent farming land should not be lost to this inappropriate development. Will affect local bridleways and footpaths. Concerned about flooding, drainage and water management.
63. *Officer's note: the proposal is not to create access from the roundabout as stated in this response.*

### **Uffington Parish Council**

#### *Final Response*

64. Object. The revisions do nothing to address our view that this is a major development in the wrong place. The proposal would damage an important SSSI. The buffer suggested is inadequate. The buildings are still too high and would impact on the landscape. Concerned about impacts on the A420. Concerned that nothing has been done to address the original consultation response from Thames Water.

#### *First Response*

65. Object. Concerned about the development encroaching on the local countryside, particularly when it crosses a settlement boundary or reduces highway safety. Site has not been allocated for this use in the Vale Local Plan.

The Faringdon Neighbourhood Plan is now out of date. The site is south of the A420 whereas whole of Faringdon is to the north. The site is an unallocated greenfield site which is a designated SSSI. Concerned about pressure on the A420 particularly during rush hours. Wish to see the access incorporated into the roundabout. Would set a harmful precedent for industrial development outside of the Local Plan.

### **County Councillor (Faringdon) – Cllr Bethia Thomas**

#### *Final Response*

66. Main objection relates to the highways management, and the need for a suitable footway across the A420. At the moment the plan does not seem fit for purpose and would cause an awful lot of congestion in an already congested area.

#### *Second Response*

67. Comments relate to the additional information. Welcome the arboricultural work and the reduction in eave height. However, there still need to be further improvements. The site would increase traffic movements on the A420. Believe that the proposed junction from the site would increase disruption. This would be reduced by locating the exit onto the existing Park Road roundabout. Concerned that the request by many for a footbridge over the A420 has been sidestepped. If it would be difficult to accommodate a bridge to accommodate horses, then would argue for a footbridge for pedestrians and cyclists would be welcome and necessary. Welcome the other suggestions for improved active travel and potential reduction in speed limit on the A420. Without careful management of traffic, the A420 and roads leading to it from surrounding villages, including Little Coxwell and Fernham, would be adversely affected.

#### *First Response*

68. Do not support. Understand that the Faringdon Neighbourhood Plan intended to see this used as employment land, this does not meet the conditions of the policy. Does not appear to include adequate provision for traffic and highways. Junction improvements would be required and enhanced along with improved mitigation for active travel, including a footbridge over the A420. The impact on the landscape is significant and unacceptable. The proposed building height should be reduced. There would need to be mitigations to protect ecology and geology and a significant level of biodiversity net gain.

69. Also concerned about the validity of the application as the site is not in the VLP Part 1 or 2. The designation in the FNP does not apply until summer 2024. Concerns have been raised about the FNP safeguarding a site which is a county matter.

70. Given the proximity to settlements and the age of the policy, the conditions may be outdated and do not take into account additional pressures seen since the

adoption of the Faringdon Neighbourhood Plan. Until see significant improvements in the design, with the insertion of a footbridge, speed reduction schemes and enhanced management at numerous intersections, would remain strongly opposed.

## **Environment Agency**

*Amended Application Consultation 4 Response August 2025*

*Amended Application Consultation 5 Response July 2025*

*Amended Application Consultation 6 Response May 2025*

71. No additional comments, previous comments still apply

*Third Response*

72. No comments to make. Please continue to use the recommendations in our previous response.

*Second Response*

73. No comments to make. Please continue to use the recommendations in our previous response.

*First Response*

74. No objection. The previous use of the land presents a medium risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the site is located on a secondary A aquifer, in an area of shallow groundwater with surface water features, in an SSSI. The submitted information demonstrates that it would be possible to manage the risks posed to controlled waters, however further detailed information would be required prior to development.

75. Request conditions requiring the submission and approval of a remediation strategy and verification report, a condition requiring work to cease until a remediation strategy is supplied should previously unidentified contamination be found, submission and approval of a scheme for managing boreholes and a condition preventing drainage systems for the infiltration of surface water to the ground without further agreement.

## **Natural England**

*Further Amended Application Response – September 2024*

*Further Amended Application Response – July 2025*

*Further Amended Application Response – November 2025*

*Further Amended Application Response`- December 2025*

76. Confirmed previous comments still apply.

*Second Response*

77. No objection, subject to appropriate mitigation being secured. Without appropriate mitigation the development would damage or destroy the interest features for which the Wicklesham and Coxwell Pits SSSI has been notified. In order to mitigate this, a condition should be added securing access to the nationally important geological features in the quarry face, so that they can be maintained, cleared and made available for collection of material for scientific purposes. A suitable buffer in front of the geological faces should be retained. Note that this has been reduced from 25 metres to 10 metres in the amended plans and encourage that the larger buffer is reinstated. A planning condition is also required to ensure the Geological Conservation Management Plan is implemented as proposed.

*First Response*

78. Further information requested to determine impacts on Wicklesham and Coxwell Pits SSSI. Requires further information in order to determine the significance of these impacts and the scope for mitigation. The geo-conservation measures proposed to mitigate impacts of the development must be clearly detailed within a geological site management plan. Without this information, Natural England may need to object.

**Active Travel England**

*Final Response*

79. No objection - welcomes a pedestrian-cyclist-equestrian toucan crossing (TN 3, p.2) and that the proposed shares foot/cycleway as being deemed appropriate for this location and subject to conditions for Travel Plan and cycle parking.

*Sixth Response*

80. No objection subject to conditions including for suitable crossing for the A420 and active travel footway/cycle way on the northern perimeter of the A420, Travel Plan and cycle parking.

*Fifth Response*

81. No objection subject to conditions. Repeats comments provided to previous consultations.

*Fourth Response*

82. No objection subject to conditions. Note the reduced floorspace since the last consultation. Position remains the same as previous response.

*Third Response*

83. No objection subject to conditions. Note the reduced floorspace since the last consultation. Position remains the same as previous response.

*Second Response*

84. No objection subject to planning conditions, including for a travel plan and cycle parking. Acknowledge the improved commitment to active travel in the amended application, including new footway along Park Road, connection with bus stop opposite Waitrose, extension of footway along the A420, provision of suitable A420 crossing, provision of footway/cycleway connections utilising existing links, provision of shared use footway/cycleway from the new signal junction north west to link with bridleway 207/2. Welcome the proposal for a toucan crossing, given the explanation of why a bridge crossing is not proposed.

*First Response*

85. Not currently in a position to support. Request further information in relation to a suitable crossing of the A420, the submission of a Framework Travel Plan and further details of cycle parking facilities and locations.

**Thames Water**

*Final Response*

86. Comments remain as per previous consultation.

*Fourth Response*

87. Waste Comments: Thames Water has identified that the existing FOUL WATER network does not have sufficient capacity to support the proposed development. As such, we request that the following condition be attached to any planning permission granted: The development shall not be occupied until confirmation is provided that either:

1. All necessary upgrades to the foul water network to accommodate additional flows from the development have been completed; or
2. A phasing plan for development and infrastructure, agreed with Thames Water and the Local Planning Authority, is in place. Where such a plan exists, no occupation shall occur other than in accordance with the approved phasing schedule.

Reason: Network reinforcement is likely to be required to support the proposed development. These upgrades are essential to avoid the risk of sewer flooding and pollution incidents.

If the Local Planning Authority considers this condition inappropriate or is unable to include it in the decision notice, it is essential to consult with Thames Water's Development Planning Department at [Devcon.team@thameswater.co.uk](mailto:Devcon.team@thameswater.co.uk) before determining the application.

Please note where network modelling is required, Thames Water will need confirmation of outline planning permission, a development phasing plan, and evidence of land ownership to be submitted to [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk) . Modelling can take 9-12 months to complete and will not commence until these have been provided.

Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network and as such we have no objection, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks.

Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network and as such we have no objection, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network.

The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

88. Water Comments: The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset/ align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](http://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)) prior to the planning application approval.

### *Third Response*

89. No objection, subject to conditions. The catchment is subject to high infiltration flows during certain groundwater conditions. However, the scale of the proposed development does not materially affect the sewer network. The application indicates that surface water would not be discharged to the public network. If this changes, an amendment to the application would be needed. The existing foul water network and sewage treatment works is unable to accommodate the needs of this development, therefore a condition should be added to ensure the development is not occupied until either foul water network upgrades have been undertaken, or a development and infrastructure phasing plan is agreed.

90. Recommend that petrol/oil interceptors should be fitted to all car parking facilities. The proposed development is located within 5 metres of a strategic water main. A condition is required to prevent construction within 5 metres of the water main. Details of diversion of this asset, or alignment of the development to avoid it, should be required by condition.

### *Second Response*

91. Repeat comments previously provided, however now advise that there would be no objection with regards to water network infrastructure capacity and no conditions are required on this. The developer should take into account the minimum pressure in the design.

### *First Response*

92. Thames Water are working with the developer to identify and deliver the off-site foul water infrastructure. An appropriately worded planning conditions should be

added to ensure that the development does not outpace the delivery of essential infrastructure.

93. Note that surface water will not be discharged to the public network. Approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.
94. Would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges to the public sewer. Any discharge made without a permit is deemed illegal. Suggest an informative should be added to any consent granted, highlighting the need for a Groundwater Risk Management Permit from Thames Water for discharging groundwater into a public sewer.
95. Have identified an inability of the existing water network infrastructure to accommodate the needs of this development. Therefore, recommend a condition requiring that the development is not occupied until necessary water upgrades have been made.
96. The proposal is within 5 metres of a strategic water main. Request a condition to ensure that there is no building over this main, or within five metres of it.

## **Oxfordshire Geology Trust**

### *Amended Application*

97. *No response. There was no response to the second consultation, but OGT wrote the Geological Site Management Plan that was submitted with the amended application, and a letter responding to Natural England's concern about the buffer zone advising that in their experience a buffer zone of 10 metres provides an appropriate buffer zone to manage, maintain and view the geological features seen on the Wicklesham quarry faces. As they contributed to application documents, it would not have been appropriate for them to also comment on them.*

### *First Response*

98. The development would incorporate Wicklesham and Coxwell Pits SSSI, designated for their unique geological interest. The SSSI owner has a statutory obligation to manage it appropriately and conserve its special features. It is one of the richest palaeontological localities in the UK. The quarry floor has minimal geological interest, but the faces allow study of the strata containing fossil assemblages. The current proposal makes little mention of the geological characteristics. To minimise the impact of any development, a Geological Site Management Plan will be necessary. This should include maintenance of quarry walls, retention of spoil heaps, permanent, unrestricted public access and provision of geological interpretation panels.

## **Oxford Friends of the Earth**

99. Object. Site is part of a Conservation Target Area and the centre of a network of we-used rights of way. The landscape is an amenity. It is not an appropriate use of land. Impacts on traffic on A420 are a matter of extreme concern. Impossible to assess the impacts and damage without more detail.

## **CPRE**

### *Final Response*

100. The previous comments still stand. Faringdon Town Council, state that the "The proposal is in accordance with Policy 4.5B of the made Faringdon Neighbourhood Plan (and, therefore, part of the current Local Plan)". Our understanding is that the Local Plan takes precedence, and that, despite the Neighbourhood Plan having been properly made, any sites that it proposes for employment have no standing, unless they are supported by the Local Plan. We cannot understand how this application has been allowed to drag on for two years and seven rounds of consultation, without a ruling on the obvious issue that this site should never come forward for development because it is not in the Local Plan.

### *Fourth Response*

101. The previous comments still stand. Faringdon Town Council, state that the "The proposal is in accordance with Policy 4.5B of the made Faringdon Neighbourhood Plan (and, therefore, part of the current Local Plan)". Our understanding is that the Local Plan takes precedence, and that, despite the Neighbourhood Plan having been properly made, any sites that it proposes for employment have no standing, unless they are supported by the Local Plan. We cannot understand how this application has been allowed to drag on for two years and seven rounds of consultation, without a ruling on the obvious issue that this site should never come forward for development because it is not in the Local Plan.

### *Third Response*

102. The previous comments still stand: This site is an SSSI, and is not allocated for development in the current Vale Local plan and hence this application should be refused. We cannot understand how the LPA has continued to accept minor amendments, and has not yet ruled on the substantive issues, which should preclude any development on the site. CPRE supports the objections raised by Great and Little Coxwell, Longcot and Uffington Parish Councils, and also the objections from the Vale District Council

### *Second Response*

103. Confirm that comments submitted in December still stand.

### *First Response*

104. Support the objections of Faringdon Town Council. The application should be refused. The SSSI should be protected. The site is not allocated in the VLP.

### **Historic England**

#### *Fifth, Sixth, Seventh, Eighth and Ninth Consultation*

105. Responded, no comments.

#### *Third Consultation*

106. Responded, no comments.

#### *Second Consultation*

107. Defer to the views of the Local Planning Authority's Conservation Officer with regard to the impact of the proposed development on the settings of Little Coxwell Conservation Area and the Grade II Listed barn and granary east of Wicklesham Lodge Farmhouse.

#### *First Consultation*

108. No comment did not need to be consulted.

### **BBOWT**

#### *Final Response*

109. The BNG baseline should not be current conditions, it should be the final product of the approved quarry restoration plan, including the ponds shown on the plan. The restoration plan already includes most of the woodland now proposed, so this cannot be considered to be new habitat. Similarly, the enhancement of medium distinctiveness poor condition woodland to high distinctiveness good condition woodland is something that should have happened in any case. If ponds are not to be included, these should be shown as lost in the metric, as they are in the approved quarry restoration. The grassland proposed would not meet the definition of lowland meadow as it comprises non-native species and would not provide benefits to native pollinator species.

#### *Third Response*

110. Maintain objection. Belief BNG should be calculated using the baseline following restoration rather than existing site conditions, for reasons previously set out and also because the aftercare was not completed until 2024, but the baseline condition was assessed between 2020 and 2023. The woodland included in the BNG metric cannot be considered new habitat as it features on the quarry restoration plan. The two large ponds on the restoration scheme should be

included. Proposals do not meet the definition of lowland meadow and comprises non-native species.

*Second Response*

111. Maintain objection. Insufficient evidence has been provided of a net gain in biodiversity. Queries apparent errors in the submitted metric, including regarding off-site provision.

*First Response*

112. Object on the following grounds: 1) protected species and surveys, 2) insufficient evidence of biodiversity net gain, 3) net gain should be in perpetuity.

113. Request further information is provided in relation to the ecological features referenced in the ecology statement for application MW.0084/17. Impacts on these features should be avoided, or as a last resort fully mitigated. Habitat suitable to support great crested newts will be impacted and further surveys are required in relation to this and also potential otter and water vole habitat. Also concur with the OCC ecologist's comments regarding biodiversity net gain. The net gain in biodiversity should be in perpetuity, which is at least 125 years. Natural England's advice should be sought due to the location of the SSSI.

**OCC Transport Development Management**

*Final Response*

114. No transport related comments on this particular submission.

*Fourth Response*

115. No objection subject to legal agreement and conditions, following consideration of the Technical Note 5 submitted in January 2025. The traffic generation is acceptable and the updated figures represent a reduction in traffic generation compared to the originally submitted application. Impact on junctions is considered acceptable.

116. Previous comments highlighted road safety concerns related to the introduction of a signal junction close to the A420/Park Road roundabout. Now satisfied with the submitted Road Safety Audit. The proposals include reducing the speed limit on the A420 in the vicinity of the site access junction to 40 mph. This would need to be secured as part of a Traffic Regulation Order which is a separate process requiring public consultation.

117. Satisfied with the submitted swept path analysis, on the basis of the understanding that traffic associated with the farm access take place via the A417 and not through the site access. The existing footpath should be removed and the route diverted to the new toucan crossing, rather than a new footway supplementing the existing footpath. Some concerns about the deliverability of the proposed footway/cycleway connection to the Park Road bus stops due to the

adjacent embankment, however these concerns can be addressed at detailed design stage. The access road should be designed to OCC adoption standards, this can be addressed through reserved matters.

118. A direct desire line would need to be provided from the site to the bus stops on Park Road. This is a matter for a future reserved matters application. The Framework Travel Plan submitted does not meet OCC criteria and would need to be revised. This can be secured by condition.

119. There are a number of matters for design that would need to be addressed at reserved matters stage, including the size of the internal roundabout, access road speed limit, junction and forward visibility splays, traffic calming, widening of bends, minimum carriageway width, cycling facilities and carriageway and footway gradients, a stage 1 safety audit, drainage details, tree locations, highway construction. Parking provision would also be assessed at reserved matters stage.

120. A Section 106 agreement will be required to secure contributions (as set out in paragraph 43 of the main report) towards public transport services, public transport infrastructure and Travel Plan monitoring. The developer will need to enter into a Section 278 agreement to carry out the proposed mitigation and improvement works including site access works, widening of the A420 on the verges and lane markings, proposed toucan crossing and associated mitigation works, provision of new footway/cycleway from toucan crossing along the northern edge of A420 to connect with existing shared footway on Park Road and the provision of bus stop infrastructure on Henry Blake Way.

121. Conditions are required for full details of access footway/cycleway, full details of off-site highway works, vision splay details, Construction Management Plan, Framework Travel Plan, Traffic Regulation Order for the raised island crossing.

### *Third Response*

122. Further Information Received. The decrease in floorspace would lead to a decrease in trips on the local network compared to the previously assessed proposal. However, in the information submitted is not clear and the year of opening used is not appropriate. A Stage 1 Safety Audit is required for the site access, prior to planning permission being granted as the findings may result in changes to the red line boundary.

### *Second Response*

123. No response received.

### *First Response*

124. Objection. Further work is needed regarding site access arrangements. The junction capacity analysis methodology is acceptable but should be repeated using a more realistic opening year, as 2024 is highly unlikely. Section 106

contributions would be required, and a Section 278 agreement would be needed to secure improvement/mitigation works including site access.

125. It is considered highly likely that the proposed signalisation of the existing quarry access would cause traffic to block back across the A420/Park Road roundabout causing congestion, when the west bound signal on the A420 is red. This would be unacceptable. A modelling exercise should be undertaken to demonstrate how the access would interact with the roundabout, and details should be provided. An alternative access arrangement should be proposed if the modelling shows unacceptable congestion from the current proposal. It is suggested that the junction could be moved further to the west. The inclusion of a toucan crossing is supported in principle.
126. Details of car parking provision, justification, cycle parking, electric vehicle charging points and a bicycle maintenance station should be provided at reserved matters stage.
127. Walking distance to bus stops should be minimised, a direct link through the site from the access road would be required. A pedestrian walking from the access to building 4 would need to walk 400m unnecessary distance compared to if they could cut through in the north east corner. The entrance to this building also appears to be located for access to the car park rather than to minimise walking distances.
128. The framework travel plan submitted with the application does not include the level of information required to meet the County's criteria and should be revised prior to first occupation and updated after three month's full occupation. A fee would be required to monitor this for five years.
129. The signalised access junction is too close to the roundabout and should be moved further west. The ghost island tapering is not to standard and will require more land to the west to achieve a satisfactory standard.
130. There are also a number of design issues that would need to be addressed at the reserved matters stage, including that the internal roundabout should be larger and another form of roundabout may be more appropriate, the speed limit of the access road should be clarified and junction and forward visibility splays should be shown.
131. If permission is granted despite this objection, a Section 106 agreement would be required with contributions towards public transport service, public transport infrastructure and travel plan monitoring. There would also need to be conditions to cover the new vehicular entrance and vision splay details.

## **OCC Rights of Way**

### *Final Response*

132. No additional comments to make regarding rights of way.

### *Third Response*

133. No additional comments, previous comments still apply.

*Second Response*

134. Previous comments on layout, design, contributions and standard measures still apply.

135. Would support any proposal for a bridge over the A420 to serve this development but can see the significant difficulties associated with this. A signalised crossing is a reasonable and deliverable alternative. The footpath and cycleway connection improvements identified in the technical note are noted and welcomed. Additional detail will be required at reserved matter stage.

*First Response*

136. There is a missing A420 crossing point at the south west of the site that doesn't seem to have been considered. This unclassified road meets the A420 and connects to the access network on each side. It's an important link and there needs to be provision for active travel modes here to enable better access. This should be included in the package of on-highways works. This might include a refuge island (suitable for cycles/horses) or signalised crossing and surface and infrastructure upgrade works on both sections.

137. The proposal for a revised footpath layout to the northeast of the site and each side of the A420 is noted. This will have a separate legal process to divert the public right of way. Given its location and the rideable network to the south, it would be in everyone's interest to make this access route a shared use cycle path and footpath to connect to bridleway 207/21. The same could apply to the footpath 207/17 north of the A420. Detail design of the road access crossing and the interaction with the footpath/bridleway is required.

138. Offsite mitigation. The consideration of landscape and visual impact is noted. This development would have a major impact on the area with a corresponding impact on the surrounding public rights of way network. A s106 contribution will be sought, separate to any transport/highways works including points 1 and 2 above, to help address some of the impacts. At this stage the impact area below is considered appropriate and a sum of £65,000 will be sought and justified with a R122 statement. This will fund surface and infrastructure improvements within c2km of the site.

139. Standard measures will apply at the appropriate point in the application lifecycle, including the requirement to take account of legally recorded public rights of way, ensuring that routes remain usable for the duration of the development, no temporary obstructions, no changes to routes without the appropriate formal diversion first being secured and no gates to open outwards from the site across any public right of way.

*Final Response*

140. No additional comments, previous comments still apply.

*First Response*

141. No objection. On the basis of previous mineral extraction and archaeological investigations undertaken within the application area, as noted in the submitted Heritage Assessment (OA October 2023), the proposals outlined would not appear to have an invasive impact upon any known archaeological sites or features. As such there are no archaeological constraints to this scheme.

## **OCC Lead Local Flood Authority (LLFA)**

*Final Consultation Response*

142. No Objection. The proposal describes a reduction in floorspace. The proposed reduction in floorspace is not deemed to have an impact on the surface water drainage regime of the site. The LLFA note the landscape buffer around the buildings has been increased, the multi-storey car park at the eastern end has been removed and replaced with tree planting and the Design Code, Illustrative Layout Plans and Landscape Plan identify a green roof requirement for buildings and car parking and specify key landscaping areas and character of the development. Should changes become necessary to the surface water drainage for the site the LLFA would request to be re-consulted.

*Fourth Consultation Response*

143. The proposed reduction in floorspace is not deemed to have an impact on the surface water drainage regime of the site. Should changes become necessary to the surface water drainage for the site the LLFA would request to be re-consulted.

*Third Consultation Response*

144. Responded to confirm previous comments still valid.

*Second Consultation Response*

145. Responded to confirm no amendments to comments already made.

*First Consultation Response*

146. No objection, subject to conditions requiring a detailed surface water drainage scheme and a record of the installed SuDS and site wide drainage scheme to be submitted and approved.

## **OCC Ecology**

**147. Recommendation: No objection**

**Comments**

148. The submitted ecological appraisal is considered appropriate at this stage. An updated ecological appraisal and any required phase 2 surveys should be submitted prior to determination at the reserved matters stage based on the final design of the development which would be informed by but supersede the ecological appraisal report submitted in support of the outline application.

A Construction and Environmental Management Plan (CEMP) based on the final development design and updated ecological assessment should be submitted either prior to determination of the reserved matters application or secured via an appropriately worded planning condition or obligation.

A lighting scheme based on the final development design should be submitted either prior to determination of the reserved matters application or secured via an appropriately worded planning condition or obligation.

The applicant has demonstrated that a minimum of 10% measurable net gain in biodiversity can feasibly be achieved on site at this stage. An updated biodiversity net gain (BNG) assessment based on the final development design and phasing should be submitted in support of the reserved matters application prior to determination. This report would be informed by but supersede the BNG framework plan submitted in support of the outline application. The specific proposed habitat condition criteria should be included for all proposed and retained habitats.

A Habitat Management and Monitoring Plan (HMMP) based on the final development design should be submitted either prior to determination of the reserved matters application or secured via an appropriately worded planning condition or obligation. This HMMP would be informed by but supersede the proposed habitat intervention measures submitted in support of the outline application.

**149. Recommendation: Additional information required**

**Comments**

150. The proposed post development woodland habitat target habitat condition criteria proposed in section 2.2 of the submitted Biodiversity Net gain Framework Plan are considered ambitious particularly regarding age classes (criteria A) and

veteran trees (criteria K). These habitat condition criteria will likely take longer than 30 years to develop and therefore the 30-year implementation period proposed in section 8.05 of the submitted BNG Framework Plan is considered insufficient. While it is appreciated that these criteria will not necessarily be required to be met in order to achieve moderate ecological condition targeted for this habitat type, consideration should still be given to how long the HMMP is likely needed to cover to achieve these criteria and this should be stated in an updated report. Alternatively, the applicant may wish to amend the habitat condition criteria targeted to more reasonably achievable targets within 30 years, particularly with regards to habitat condition criteria that rely on the development of ancient and veteran trees.

*Response to eighth consultation – October 2025*

## **151. Recommendation: Additional information required**

### **Comments**

It is noted that the submitted biodiversity net gain (BNG) framework plan identifies the approved restoration scheme as delivering more BNG units than current site conditions. Any subsequent BNG plans submitted should take this account and demonstrate a BNG and additionality above the approved restoration scheme for the site.

The submitted response titled 'Mw 0151 23 Biogenia Occ Ecology Consultation 22 10 25 Response' states that no assumptions have been made regarding the habitat types and conditions included within the baseline BNG metric regarding the approved restoration as they are based on an assessment of the current site conditions and habitats present. However, other broad leaved woodland has been classified as poor ecological condition in the current baseline BNG metric and in good condition in the approved restoration scheme baseline BNG metric. Therefore an assumption has been made regarding the condition of this habitat in a poorer condition than is currently present on site. An assumption has also been made regarding pond habitat type and condition present within the restoration scheme baseline as there are currently no ponds present on site. An explanation of these assumptions is therefore requested and it is recommended that the approved aftercare scheme for the site is referred to.

Section 4.0 of the submitted BNG framework plan outlines the proposed phasing scheme for the site, however this does not appear to be reflected in the submitted BNG metric spreadsheets. Clarification is therefore requested to explain how the proposed phasing has been considered in the BNG values calculated and the submitted BNG metrics updated as appropriate.

It is appreciated that clarification has been provided regarding how strategic significance has been calculated. The enhancement of other broadleaved woodland included in tabs A3 of both submitted BNG metrics is classified as 'high' strategic significance along with hedgerow creation and enhancement

interventions in tabs B2 and B3. It is requested that this is amended in line with the stated methodology for determining strategic significance as outlined in section 3.0 of the submitted BNG framework as these habitat interventions are not delivering Conservation target Area objectives.

The proposed post development woodland habitat condition of good and target habitat condition criteria are considered ambitious particularly regarding age classes, canopy stories, veteran trees and ancient woodland ground flora. This habitat condition and criteria will likely take longer than 30 years to develop. While it is appreciated that not all of these criteria will be required to be met in order to achieve good ecological condition of this habitat type, consideration should still be given to how long the HMMP is likely needed to cover to achieve these criteria and this should be stated in an updated report. Alternatively, the applicant may wish to amend the habitat condition and criteria targeted to more reasonably achievable targets, particularly veteran trees and ancient woodland ground flora which may take hundreds of years to establish successfully even if introduced.

*Response to seventh consultation – September 2025*

#### **152. Recommendation: Additional information required**

##### **Comments**

The submitted Biodiversity Net Gain (BNG) assessment report should be amended and resubmitted to include an identification of the calculation with the baseline (current site conditions compared to the approved restoration scheme) with highest biodiversity value and how the BNG mitigation hierarchy was applied. This report should also include how other methodology has been applied including how strategic significance was determined. For example, other neutral grassland, other broadleaved woodland, ponds and lowland meadow are not identified as targets within the objectives of West Oxfordshire Heights Conservation Target Area (CTA). For the purposes of assessing strategic significance, inclusion within objectives of a CTA should be considered as 'within an area formally identified in a local strategy'. The report should be supported by the submission of an updated BNG metric spreadsheet that utilises the approved restoration scheme of the site to help inform the comparison mentioned above.

The figures submitted of the baseline habitats includes individual trees. Clarification is requested how this habitat type has been accounted for in the submitted BNG metric spreadsheet.

It is noted that the first line of the habitat enhancement tab involves the enhancement of scrub to pond habitat. Habitat enhancement should only be applied where the baseline habitat is retained and there is:

- an improvement in condition compared to the baseline state
- a change to a higher distinctiveness habitat within the same broad habitat

group compared to the baseline state

- restoration of relict high or very high distinctiveness habitats
- restoration of intertidal habitats

In line with BNG metric guidance the scrub habitat should therefore be identified as lost and the proposed pond habitat created.

The specific proposed habitat condition criteria should be included for all proposed habitats.

*Response to sixth consultation (Biodiversity amendments) – August 2025*

### **153. Recommendation: Additional information required**

#### **Comments**

Document reviewed:

- Biogenia Bng Metric With Restoration Scheme Baseline July 2025
- Biogenia Bng Metric With Current Baseline July 2025 A
- 3622 Tip L Wicklesham Landscape & Ecological Mitigation And Enhancement Plan Rev C

The previously submitted Biodiversity Net Gain (BNG) assessment report should be amended and submitted to provide an accompanying explanation of the assessments and conclusions made including an identification of the calculation with the baseline with highest biodiversity value and how the BNG mitigation hierarchy was applied. This report should also include how other methodology has been applied including how strategic significance was determined. For example, other broadleaved woodland, ponds and lowland meadow are not identified as targets within the objectives of West Oxfordshire Heights Conservation Target Area (CTA). For the purposes of assessing strategic significance, inclusion within objectives of a CTA should be considered as 'within an area formally identified in a local strategy'.

It is noted that the post development habitat areas do not all match between the two submitted metrics. It is requested this is amended to ensure they match in order to ensure they are representative and to allow a comparison to be made.

The existing grassland is now classed as 'Rye Grass and Clover Ley' in the current baseline calculation but as cereal crops in the restoration baseline calculation. This does not match the approved restoration scheme that includes these areas as grassland.

Enhancement of woodland is proposed (second line in the enhancement tab of The metric using the approved restoration scheme as the baseline), from Other Woodland, Broadleaved in Poor condition to deliver Lowland Mixed Deciduous Woodland in Good condition. This process is aiming to create semi-natural Priority Habitat Woodland, which is considered unfeasible in a 30 management

time frame and may take hundreds of years. It is therefore requested that this is amended as appropriate.

The second line of enhancement for both metrics show Lowland Mixed Deciduous Woodland being delivered by enhancing non-woodland habitats including built linear features in the existing baseline calculator and non-priority ponds in the restoration baseline calculation. These changes should instead be treated as losses and new habitat creation.

The proposals still propose Lowland Meadow in Good condition, via grassland creation. Where areas of native species-rich grassland seed mixture are proposed lowland meadow is considered unlikely pending a soil sample. The applicant may wish to target 'Other Neutral Grassland' in moderate or good condition instead as this habitat and ecological condition(s) are considered more feasible.

The specific proposed habitat condition criteria should be included for all proposed habitats.

To summarise the information submitted is too incomplete and there are too many errors to be able to conclude whether the application will demonstrate a measurable net gain in biodiversity in order to satisfy NPPF and local planning policy.

*Response to fifth consultation (landscaping amendments) – June 2025*

154. Further information required. Due to the amendments to the landscaping proposals the BNG assessment should be updated. This is also an opportunity to correct errors identified in it.

*Further Response – December 2024*

155. No objection. The submitted ecological appraisal is appropriate at this stage. An updated ecological appraisal, any required phase 2 surveys and updated BNG assessment should be submitted prior to determination at the reserved matters stage based on the final design. Soil sampling should be undertaken. A Construction and Environmental Management Plan (CEMP), lighting scheme and Habitat Management and Monitoring Plan (HMMP) based on the final development design and updated ecological appraisal should be submitted either prior to determination of the reserved matters application or secured via an appropriately worded planning obligation

*Further Response – 25th October 2024*

156. The BNG report should be updated to reflect the BNG metric, and a number of other amendments requested in this response. The LEMP should be updated or withdrawn to be provided under condition. Some changes required to the BNG metric regarding habitat types. Soil sampling should be undertaken to determine the feasibility of creating lowland meadow habitat. This is needed prior to determination.

#### *Fourth Response*

157. Further updates to the BNG metric are required and amendments to submitted documents to ensure consistency.

#### *Third Response*

158. Further information required. Additional information submitted by the applicant addresses some previous concerns. Surveys for great crested newts and water voles can be secured by pre-commencement condition. It is appreciated that the existing pond basin is to be retained and enhanced. The justification for including on-native species in the planting mix is considered insufficient and it is less recommended that native alternatives are used. However, if these recommendations are not followed and other comments are fully addressed, it is likely that a measurable net gain in biodiversity will be achievable.

159. The BNG calculations need to be updated because the hedgerows on site meet the habitat definition for hedgerows, regardless of quality.

#### *Second Response*

160. Further information required, including an update to the ecological assessment to address the fact that the ponds have been holding water. At least one of the ponds should be enhanced. A revised BNG metric calculation should be provided. The introduced scrub and vegetated garden habitats to be created on site should be replaced with native alternatives.

#### *First Response*

161. More information required. The proposal would impact habitat suitable to support Great Crested Newts and further survey effort is needed in relation to this and also otters and water voles.

162. Further information is also required regarding Biodiversity Net Gain, including an updated metric and quote and agreement to demonstrate that offsite compensation can be achieved in line with the submitted assessment.

### **OCC Landscape**

#### *Final Response*

163. The following response should be read in conjunction with my previous comments.

In response to my comments and those of others, the applicant has made further revisions to the Parameter Plan, Design Code and Illustrative Masterplan: In addition to the central buffer and larger landscape areas the Parameter Plan now includes a note that the combined building footprint will not exceed 50% of the developable (yellow) area. The swale and bicycle storage has also been removed from the eastern landscape buffer.

The design code has been updated so that it now states a greater emphasis on green roofs and material choices and arrangements (now dark materials on top/lighter materials at the bottom).

As such the latest revision address my previous comments.

On the basis that the site forms part of the development plan, and the principle of industrial development on this site has been established by the allocation of the site in the Neighbourhood Plan, I consider the development on balance acceptable in landscape and visual terms subject to conditions.

**Conditions:**

Condition covering the following are required should the development be approved:  
Landscape and Visual Impact Assessment at Reserved Matters Stage

Design in line with the latest revision of the Parameter Plan and the principles outlined in the Design Code (including material and colour choices),

Building materials and roof design,

Lighting

Detailed Landscaping scheme

Long-term landscape management plan (it is likely that this can be covered by the HMMP)

*Seventh Response*

164. I have commented on the scheme before, and the following response should be read in conjunction with my previous comments.

As mentioned in my previous consultation responses it is my understanding that that the principle of industrial development on this site has already been established by the allocation of the site in the Neighbourhood Plan. Therefore, acceptability in landscape and visual terms depends on a design that keeps landscape and visual effects at a minimum and that positively responds to the site and its surrounds. The applicant has made further updates to address previous comments on the parameter plan, overall layout and illustrative material and design guidance.

The scheme has been revised, and the latest revision of the Parameter Plan and illustrative drawings in the design code show a reduced developable area, a central landscaping/screening zone running through the centre of the site, a larger undeveloped landscape zone at its western end and the southeastern corner, as well as a slightly enlarged landscaping zone at the northeastern corner. This is an improvement to the previous version of the plan, which only

indicated a 12m wide ecological peripheral buffer and a 10m wide landscape peripheral buffer. However, the peripheral landscape buffer still shows to includes a swale along its eastern boundary, which is likely to mean that it cannot be used for tree planting as required. This is an issue that has been raised previously. NE have also requested a 25m buffer in front of the quarry faces in which tree planting should be limited to avoid obscuring views of the geological outcrops.

Comments from the drainage officers, county ecologist and county archaeologist should be sought to ensure that there is no conflict with other requirements and that the proposed landscape buffer is wide enough for tall tree planting.

Any potential consent should ensure a sufficiently-wide buffer is secured so that both these functions can be accommodated.

The parameter plan does also still not include the Design Code principle that no more than 50% of the development area will be developed as requested in my previous comments. As such the developable area would only be controlled by a combination of the parameter plan and the permitted floorspace. This might potentially be sufficient and might not result in more than 50% being taken up by development but it is difficult to judge without knowing the size of the developable area. This information appears neither to be provided on the Parameter Plan or in the supporting information. Clarification should on this be sought.

## **Overall Layout and Design**

Following my previous comments, the decked car park previously shown along the southern edge of the development have been omitted but are still referred to in the Design Code. This should be clarified.

I also note a number of elements in the design code that will need amending. These echo comments also made by VoWH heritage officer and VoWH landscape officer:

- Design Principles - Lighting: As per my previous comments the intention for a sensitive lighting design is welcomed. Lighting considerations should be integral to the design, e.g. by limiting windows on the outward-facing elevations and by avoiding large glass elevations as they are currently shown in the design code. The should be amended in the design code. A lighting condition will also be required should the development be approved. Design Principles – Building elevations: As mentioned previously, I don't consider the subtle falls in the roof to offer sufficient variation of the roofscape as it is suggested in the Design Code. Additional measures will be required, e.g. variation in the roof scape, different roof treatments – green/brown roofs should be used predominantly to mitigate impacts on elevated views as requested by the heritage officer. Material choices and colours and their use in the development will also need further consideration at reserved matters stage should the development be approved.

As mentioned previously, I recommend that colour and material choices follow a similar approach as it has been developed by the NWD when considering development (Guidance on the selection and use of colour in development: survey). This will assist in choosing materials and colours that allow the development to blend into the surrounding landscape should the development be approved.

I am not sure whether any potential planning consent can require that the Reserved Matters design is guided by the development principles outlined on the Illustrative Masterplan and/or the design code. If this is possible, I recommend that this is adequately secured.

### **Conclusions:**

The development will introduce an urban form into an area that is currently rural. However, this impact on the landscape character and views has to be considered in the context that the site is allocated for B2 and B8 uses in the Faringdon NP and as such the principle for industrial use on this site has already been established.

Latest iteration of the Parameter Plan is an improvement and addresses most of my previous comments. Having said this, the landscape buffer along the eastern boundary next to building 4 has not been increased and uncertainty about the feasibility of this buffer for tree planting along other requirements remains. Any consent should seek to ensure a sufficiently wide buffer in this location that allows for tree planting.

The Parameter Plan does also still not include the design code principle that development footprints should not exceed 50% of the Developable Area.

Development footprints will therefore be controlled by the Parameter Plan in combination with the permitted floorspace only. This might potentially be sufficient but is difficult to judge without knowing the size of the developable area as shown on the Parameter Plan. Clarification should be sought.

There are elements in the design code that need revising, in particular in relation to the roofscape, building elevations and material choices and colours. If the principle of this type of development is accepted in this location, I consider that the development would on balance be acceptable in landscape and visual policy terms subject to above comments being adequately addressed.

The following aspects will need to be secured via conditions or other means should the development be approved:

- Update to the Landscape and Visual Impact Assessment
- Design in line with the overall approach outlined on the Illustrative Masterplan (if possible)
- Detailed design (including material and colour choices),
- Roof design,
- Lighting
- Detailed Landscape scheme
- Long-term landscape management

*Response to Further Amended Application – July 25* I have commented on the scheme before, and the following response should be read in conjunction with my previous comments. In my previous comments I asked for the following issues to be addressed: *A more substantial landscape scheme of mitigation tree planting within the site in line with relevant guidance and which includes a landscape buffer between the ecological buffer and the buildings. This should be reflected in the parameter plan. Sensitive roofscape design that reduces impacts from Folly Hill. This should include form, choice of materials and the omission/redesign of the open deck car park.*

- *A detailed lighting design that is sensitive to the location and minimizes adverse effects on views.*
- *A revision of the parameter plan to reflect key design principles of the layout (e.g. building parameters, main green infrastructure elements such as landscape corridors and buffers) and which ensures that no more than 50% of the development area will be subject to development as it is suggested in the Design Code.*

### **Landscaping scheme**

As outlined in the previous comments a substantial landscape scheme of tall trees and hedgerows is required to reduce visual impacts and successfully embed the development into the surrounding landscape as required by planning policy.

The scheme has been revised and now indicates an approximately 10m wide landscape buffer inside the already proposed peripheral 10m wide ecological buffer. The proposed landscape buffer is welcome in landscape and visual terms, however I note that it is labelled as a swale on the Illustrative Masterplan indicating a shared function, which might restrict tree planting.

Neighbourhood Plan policy 4.5B requires amongst other things that the interest of the *geological features* is not harmed, and that '*appropriate measures to provide access to the protected site for the visiting public*' are ensured. Natural England's consultation response to this application is 'no objection' subject to appropriate mitigation being secured. This is to include maintaining access to the nationally important geological features, a buffer in front of the geological faces and the geological conservation masterplan to be implemented as described. As part of their advice, NE have also suggested increasing the geological buffer

zone in front of the quarry faces from 10m to 25m, and that tree planting within in the buffer should be limited to avoid obscuring views of the outcrops.

The landscape buffer will increase the buffer zone in front of the quarry faces, but it is not clear how much of it can in effect be used for tree planting. Comments from the drainage officers, county ecologist and county archaeologist should be sought to ensure that there is no conflict with other requirements and that the proposed landscape buffer is wide enough for tall tree planting.

It is difficult to judge whether the structural landscaping has otherwise been enhanced as stated in the supporting letter. From a landscape and visual point of view the integration of large trees along the periphery and throughout the site to break up the built form are required. The proposed 'Super bloom' treatment as suggested in the Design Code does not meet this requirement and is therefore not supported in landscape and visual terms.

The Illustrative Masterplan suggests that there is space for tall tree planting within the centre of the site and between buildings, however, this is not reflected on the Parameter Plan.

## Parameter Plan

My previous comments and requests re the Parameter Plan have only been addressed in parts.

The Parameter Plan has been revised and now includes an approximately 10m peripheral landscape buffer in addition to the ecological buffer. This is welcome and the landscape buffer is also shown to extend along the partial viewing corridor. However, the Parameter Plan does not include other key green infrastructure elements that have been requested such as the linear park and other 'key open spaces' (e.g. the western open space) outlined on the Illustrative Masterplan and in the Design Code.

The Parameter Plan does also not show the building parameters. In this context I also note that the extent of the 'developable zone' shown on the Parameter Plan appears to differ from the 'development area' as indicated in some of the Design Code drawings, e.g. 'Vehicular Movement – Circular Road' or the 'Building Scale' drawings. The reason for these differences is not clear and should be clarified.

The key to the Parameter Plan does also not include the Design Code principle that no more than 50% of the development area will be developed. This requirement should be reflected on the Parameter Plan as it would provide confidence that there will be sufficient space for tall tree planting across the site.

## Overall Layout

Following my previous comments, the deck car park previously shown at the southeastern corner of the site has been omitted, however, the 12m high deck car park located near the southwestern end is still proposed. It is indicated outside the proposed circular road, despite the design principles in the Design Code stating: *The total footprint for built form should not be more than 50% of the development area, which is to be contained by the circular road.* Notwithstanding, that the detailed design and layout are only illustrative, this seems a contradiction in the design approach.

The remaining deck car park is located close to the southern boundary and visible from the Vale Way. The design of this deck car park is not clear, but it has the potential to adversely affect views from the Vale Way. Visual impacts could be reduced if the deck car park was relocated closer to the entrance and northern boundary of the site and/or a sensitive design approach was adopted to minimise its impact, e.g. lowering of the building, green roof, no lighting, sensitive material choices, the use of climbers or similar.

## **Design Code**

Further observations relating to the Design Code: Design Principles - Landscape: As outlined above I agree and welcome the provision of a central linear park and other green buffers and links, but these will need to comprise tall tree planting rather than the super bloom treatment. The drawing shown for this design principle does also not show the recent change of the additional peripheral buffer.

- Design Principles – Parking: As per my comments above, this plan shows the deck car park to be located outside the circular road and the development area. I remain concerned about the impact of this building in views from the Vale Way and the Folly Hill, especially if it was built at the maximum height and if it was open deck. The relocation of the deck car park closer to the entrance to the site and/or a sensitive design approach should be considered.
- Design Principles - Lighting: the intention for a sensitive lighting design is welcomed. As per my previous comments, lighting considerations should be integral to the design, e.g. by limiting windows on the outward-facing elevations. A lighting condition will be required should the development be approved.
- Design Principles – Massing / site: the latest iteration of the Design Code includes additional information on roof materials including references to green roofs, the use of which is supported in landscape and visual terms. However, I don't consider the subtle falls in the roof to be effective in breaking up massing or offering sufficient variation of the roofscape as suggested. Additional measures will be required, e.g variation in the roof scape, different roof treatments (including green roofs) in combination with sufficient structural tree planting within the site. The roof design could be dealt with via a condition should the development be approved.
- Design Principles – Building elevations: Despite the development not being located within the NWD National Landscape it is recommended that the NWDNL guidance on colour Guidance on the selection and use of colour in development: survey is used when developing the detailed design at Reserved Matters stage. This will assist in choosing materials and colours that allow the development to blend into the surrounding landscape should the development be approved.

### **In summary:**

My previous comments and requests have been addressed in parts. The latest change to the Parameter Plan shows a peripheral buffer next to the ecological buffer and swale, which is welcomed, however, it does not show any other key green infrastructure elements outlined in the Design Code and Illustrative Masterplan such as the central linear park and western open space.

It is also not yet fully understood how much of the peripheral buffer can effectively be used for tree planting.

The Parameter Plan does also not include the requested detail on building parameters, nor does it reflect the design principle that no more than a maximum of 50% of the development area will be developed.

The latest revision includes the omission of one of the two decked car parks from the southern boundary, but the second one is still proposed and remains visible from the Vale Way. It is suggested that the remaining deck car park is either omitted or relocated closer to the northern site boundary and site entrance. As sensitive design approach will also be required should it be retained.

With all matters except access being reserved, and the acceptability of the scheme in landscape and visual terms being dependent on the development providing sufficient space for landscaping and tree planting, I remain concerned that the Parameter Plan does not include all the requested information.

As per my previous comments, I believe that the development could on balance be acceptable in landscape policy terms if the following key principles of the Design Code can be adequately secured as part of this application:

- maximum 12m building height,
- no more than a maximum 50% of the developable area being developed,
- key green infrastructure areas to provide sufficient space for tall tree planting, i.e. a peripheral landscape buffer, the linear central park, the western open space and any other key GI corridors between the buildings shown in the design code.

As approval of the Parameter Plan is being sought as part of this application, I recommend that these key design principles are reflected on the Parameter Plan.

In addition, a number of conditions relating to detailed design, roof design, lighting and landscape management will also be required should the development be approved.

#### *Sixth Response*

165. I have commented on the scheme before, and the following response should be read in conjunction with my previous comments. In my previous comments I asked for the following issues to be addressed:

- A more substantial landscape scheme of mitigation tree planting within the site in line with relevant guidance and which includes a landscape buffer between the ecological buffer and the buildings. This should be reflected in the parameter plan.
- Sensitive roofscape design that reduces impacts from Folly Hill. This should include form, choice of materials and the omission/redesign of the open deck car park.
- A detailed lighting design that is sensitive to the location and minimizes adverse effects on views.

- A revision of the parameter plan to reflect key design principles of the layout (e.g. building parameters, main green infrastructure elements such as landscape corridors and buffers) and which ensures that no more than 50% of the development area will be subject to development as it is suggested in the Design Code.

### Landscaping scheme

As outlined in the previous comments a substantial landscape scheme of tall trees and hedgerows is required to reduce visual impacts and successfully embed the development into the surrounding landscape as required by planning policy. The scheme has been revised and now indicates an approximately 10m wide landscape buffer inside the already proposed peripheral 10m wide ecological buffer. The proposed landscape buffer is welcome in landscape and visual terms, however I note that it is labelled as a swale on the Illustrative Masterplan indicating a shared function, which might restrict tree planting. Neighbourhood Plan policy 4.5B requires amongst other things that the interest of the geological features is not harmed, and that 'appropriate measures to provide access to the protected site for the visiting public' are ensured. Natural England's consultation response to this application is 'no objection' subject to appropriate mitigation being secured. This is to include maintaining access to the nationally important geological features, a buffer in front of the geological faces and the geological conservation masterplan to be implemented as described. As part of their advice, NE have also suggested increasing the geological buffer zone in front of the quarry faces from 10m to 25m, and that tree planting within in the buffer should be limited to avoid obscuring views of the outcrops. The landscape buffer will increase the buffer zone in front of the quarry faces, but it is not clear how much of it can in effect be used for tree planting. Comments from the drainage officers, county ecologist and county archaeologist should be sought to ensure that there is no conflict with other requirements and that the proposed landscape buffer is wide enough for tall tree planting. It is difficult to judge whether the structural landscaping has otherwise been enhanced as stated in the supporting letter. From a landscape and visual point of view the integration of large trees along the periphery and throughout the site to break up the built form are required. The proposed 'Super bloom' treatment as suggested in the Design Code does not meet this requirement and is therefore not supported in landscape and visual terms. The Illustrative Masterplan suggests that there is space for tall tree planting within the centre of the site and between buildings, however, this is not reflected on the Parameter Plan.

### Parameter Plan

My previous comments and requests re the Parameter Plan have only been addressed in parts. The Parameter Plan has been revised and now includes an approximately 10m peripheral landscape buffer in addition to the ecological

buffer. This is welcome and the landscape buffer is also shown to extend along the partial viewing corridor. However, the Parameter Plan does not include other key green infrastructure elements that have been requested such as the linear park and other 'key open spaces' (e.g. the western open space) outlined on the Illustrative Masterplan and in the Design Code. The Parameter Plan does also not show the building parameters. In this context I also note that the extent of the 'developable zone' shown on the Parameter Plan appears to differ from the 'development area' as indicated in some of the Design Code drawings, e.g. 'Vehicular Movement – Circular Road' or the 'Building Scale' drawings. The reason for these differences is not clear and should be clarified. The key to the Parameter Plan does also not include the Design Code principle that no more than 50% of the development area will be developed. This requirement should be reflected on the Parameter Plan as it would provide confidence that there will be sufficient space for tall tree planting across the site.

### Overall Layout

Following my previous comments, the deck car park previously shown at the southeastern corner of the site has been omitted, however, the 12m high deck car park located near the southwestern end is still proposed. It is indicated outside the proposed circular road, despite the design principles in the Design Code stating: The total footprint for built form should not be more than 50% of the development area, which is to be contained by the circular road. Notwithstanding, that the detailed design and layout are only illustrative, this seems a contradiction in the design approach. The remaining deck car park is located close to the southern boundary and visible from the Vale Way. The design of this deck car park is not clear, but it has the potential to adversely affect views from the Vale Way. Visual impacts could be reduced if the deck car park was relocated closer to the entrance and northern boundary of the site and/or a sensitive design approach was adopted to minimise its impact, e.g. lowering of the building, green roof, no lighting, sensitive material choices, the use of climbers or similar.

### Design Code

Further observations relating to the Design Code:

- Design Principles - Landscape: As outlined above I agree and welcome the provision of a central linear park and other green buffers and links, but these will need to comprise tall tree planting rather than the super bloom treatment. The drawing shown for this design principle does also not show the recent change of the additional peripheral buffer.
- Design Principles – Parking: As per my comments above, this plan shows the deck car park to be located outside the circular road and the development area. I remain concerned about the impact of this building in views from the Vale Way and the Folly Hill, especially if it was built at the maximum height and if it was

open deck. The relocation of the deck car park closer to the entrance to the site and/or a sensitive design approach should be considered.

- Design Principles - Lighting: the intention for a sensitive lighting design is welcomed. As per my previous comments, lighting considerations should be integral to the design, e.g. by limiting windows on the outward-facing elevations. A lighting condition will be required should the development be approved.
- Design Principles – Massing / site: the latest iteration of the Design Code includes additional information on roof materials including references to green roofs, the use of which is supported in landscape and visual terms. However, I don't consider the subtle falls in the roof to be effective in breaking up massing or offering sufficient variation of the roofscape as suggested. Additional measures will be required, e.g. variation in the roofscape, different roof treatments (including green roofs) in combination with sufficient structural tree planting within the site. The roof design could be dealt with via a condition should the development be approved.
- Design Principles – Building elevations: Despite the development not being located within the NWD National Landscape it is recommended that the NWDNL guidance on colour Guidance on the selection and use of colour in development: survey is used when developing the detailed design at Reserved Matters stage. This will assist in choosing materials and colours that allow the development to blend into the surrounding landscape should the development be approved.

In summary:

My previous comments and requests have been addressed in parts.

The latest change to the Parameter Plan shows a peripheral buffer next to the ecological buffer and swale, which is welcomed, however, it does not show any other key green infrastructure elements outlined in the Design Code and Illustrative Masterplan such as the central linear park and western open space. It is also not yet fully understood how much of the peripheral buffer can effectively be used for tree planting.

The Parameter Plan does also not include the requested detail on building parameters, nor does it reflect the design principle that no more than a maximum of 50% of the development area will be developed.

The latest revision includes the omission of one of the two decked car parks from the southern boundary, but the second one is still proposed and remains visible from the Vale Way. It is suggested that the remaining deck car park is either omitted or relocated closer to the northern site boundary and site entrance. A sensitive design approach will also be required should it be retained.

With all matters except access being reserved, and the acceptability of the scheme in landscape and visual terms being dependent on the development providing sufficient space for landscaping and tree planting, I remain concerned that the Parameter Plan does not include all the requested information.

As per my previous comments, I believe that the development could on balance be acceptable in landscape policy terms if the following key principles of the Design Code can be adequately secured as part of this application:

- maximum 12m building height,
- no more than a maximum 50% of the developable area being developed,
- key green infrastructure areas to provide sufficient space for tall tree planting, i.e. a peripheral landscape buffer, the linear central park, the western open space and any other key GI corridors between the buildings shown in the design code.

As approval of the Parameter Plan is being sought as part of this application, I recommend that these key design principles are reflected on the Parameter Plan.

In addition, a number of conditions relating to detailed design, roof design, lighting and landscape management will also be required should the development be approved.

#### *Fifth Response*

166. On balance, the development can be made acceptable in landscape and visual terms subject to some issues being addressed prior to determination. A more substantial scheme of mitigation tree planting is needed and a revision to the parameter plan to reflect the suggestion in the Design Code that no more than 50% of the Development Area would be developed. Conditions are required on roof design and lighting.
167. The flexible outline planning application creates uncertainty and makes making a judgement on landscape and visual impact difficult. The amendment to a 12-metre maximum height is an improvement. However, the development would still exceed the quarry edge. Screening will be less effective in winter. The sensitive view from Folly Hill remains open. Roof must be designed in a way to minimise impacts, for example green roofs and non-reflective solar panels. Additional planting would further break up this view. Suggest the car parks should be re-designed to remove the open top deck, as parked cars are very reflective. A substantial integrated landscape scheme of trees and hedgerows is required. The Illustrative Masterplan currently shows no space for tree planting between the ecological buffer and the development area. Concerned that the parameter plan shows the developable area to comprise the whole quarry floor.

The updated Design Statement states that a maximum of 50% of this area would be built on, but this should be reflected in the Parameter Plan, or this should be conditioned. A detailed lighting scheme is required, this could be conditioned.

*Fourth Response*

168. Objection. The latest iteration does not appear to change the scale, bulk and appearance of the development in the landscape and views and as such previous comments and recommendations still apply. It is not easy to see what has changed on the revised plans. The response to landscape matters document refers to additional mitigation planting, but this cannot be seen on the submitted plan. There are few differences between the submitted and amended visualisations. The Parameter Plan has not been revised, so previous comments and concerns regarding this continue to apply.

*Third Response*

169. Objection. The application seeks approval for the principle of the development and its height, scale and massing, which is of key concern in landscape and visual terms. The Parameter Plan shows buildings could be placed across much of the quarry floor. Whilst much of the information is illustrative. Details have been put forward to allow an assessment in landscape and visual terms. The depth of the quarry is not 8m but varies from 3m to 8m. Therefore, the development could exceed the quarry edge by 12m in places, despite the reduced height. Landscaping is proposed within the quarry, rather than on the edge where it would be most effective.
170. Based on the information provided, the proposed development is too large in scale, bulk and height for this location, and would cause unacceptable adverse effects on the local landscape character and selected public views. With the parameters of quantum, scale and height set as part of this application I do not believe that effects on landscape character and views can be successfully overcome at reserved matters stage through detailed design choices.
171. Previous comments still apply. The development is in conflict with local planning policy in particular VLP 2031 policies 37 (Design & Local Distinctiveness) and core policy 44 (Landscape), and Faringdon Neighbourhood Plan policies 4.5 b) and 4.7 e).

*Second Response*

172. The outline nature of the application is a concern, because the acceptability in landscape terms is dependant on the height, scale, bulk and design of the buildings and associated landscaping. The reduction in maximum building heights would reduce the impact of the scheme, but it would still exceed the quarry edge and be clearly visible from rights of way and Folly Tower. The large

building blocks and roofscapes would be at odds with the surrounding landscape character adjacent to the edge of town. Changes do not go far enough to materially change the impact of the scheme on the landscape character and views. Previous comments still apply. The scheme does not meet local planning policy requirements.

*First Response*

173. Objection. Consider the proposed development to be too large in scale, bulk and height, and to be of inappropriate design for this location, causing unacceptable adverse effects on the local landscape character and public views. Consider some of the impacts on local landscape character and visual receptors to be understated by the Landscape and Visual Appraisal.
174. The 25 metre buildings will exceed the edge of the quarry (8 metres) and the surrounding vegetation, and will be visible in views. The large scale, massing, bulk, height and appearance of the development is unlike anything in the area and does not reflect local characteristics or responds positively to its surrounds. The proposed mitigation measures are not sufficient in reducing the impact of the development on landscape character and views as many of these measures are 'internal' to the scheme. Whilst rock faces would be retained, their context would fundamentally change in character. The viewing corridor retains a narrow sight line to Folly Hill, but would fundamentally change the experience of this view.
175. The development would fundamentally change and significantly affect the nature and expanse of views from a number of public vantage points. It would 'jump' the A420, which currently forms an effective southern edge to the expansion of Faringdon and introduce large incongruous built-form into the countryside affecting the setting of Faringdon.
176. The proposal would introduce lighting to a dark, rural location, which would further add to landscape and visual impacts. Some proposed measures to control lighting would be difficult to control, for example the use of internal blinds. Noise and motion would be introduced to the site by the development and traffic. Concerned about a safe crossing point for rights of way users to cross the A420.

**OCC Tree Officer**

*Final Response*

177. No additional comments, previous comments still apply.

*Fifth Response*

178. No additional comments, previous comments still apply.

*Fourth Response*

179. No additional comments, previous comments still apply.

*Third Response*

180. The number of trees to be removed adjacent to the access is significant and a comprehensive landscaping plant will be required to mitigate the loss of these trees, with tree planting throughout the site. A landscape management plan to ensure planting successfully establishes will also be required. As this application is outline, this will need to be considered in detail at the reserved matters stage and/or suitable conditions attached to ensure mitigation planting is secured.
181. The Arboricultural Impact Assessment and Tree Protection Plan have been revised as requested, although the Tree Schedule should be further revised to remove the statement that it is likely that ash trees would development Chalara dieback.

*Second Response*

182. Object. In its current form, the proposal is contrary to the Tree Policy for Oxfordshire and VLP policy CP44. The trees to be removed to the west of the access should be surveyed and assessed individually in order to make an accurate assessment of the number of trees to be removed. The justification for downgrading the quality of trees is not satisfactory. Further justification is needed to demonstrate the proposed works to the access is necessary and there is no alternative option that would allow these trees to be retained, given the existing access to the site. If permission is granted, a condition is required to secure an updated Arboricultural Method Statement and Tree Protection Plan. A landscaping condition would also be needed to secure planting to help mitigate for the trees lost.

*First Response*

183. Holding Objection. Although a tree survey has been submitted, no Arboricultural Impact Assessment has been provided. Therefore, it has not been possible to assess the impact of the development on highway trees. The proposed changes to the access have the potential to have very significant arboricultural impacts and involve the removal of a large number of trees. The applicant should be aware of the Tree Policy for Oxfordshire.

## Annex 4 - Representations

1. A total of 243 third-party representations were received during the initial consultation. Nine of these were in support, three were in partial support and the rest were objections. 93 representations were received during the second consultation, of which five were in support and the rest were objections. 36 representations were received during the third consultation, of which five were in support and the rest were objections. The issues raised are summarised below. 8 representations were received following the end of the third consultation. 30 representations were received during the fourth consultation. 16 representations were received during the fifth consultation period, of which one was in support and fifteen in objection. 8 representations were received during the sixth consultation period of which one was in support and 7 in objection. 15 representations were received during the seventh consultation period of which one was in support and 14 in objection. Five representations were received during the eighth consultation period which were all in objection to the application. Four representations were received during the ninth consultation period of which one was in support and three in objection. The consultation letters for the subsequent consultations made it clear that people only needed to make further representations if they had additional comments on the amended proposals or further information. If comments were unchanged there was no need to write in again as they would be taken into account.

### 2. Traffic and Highways

- A420 and surrounding roads are at capacity and cannot take any more traffic.
- Concerns about safety of the access, vehicles heading to Oxford or Faringdon would need to turn right.
- Concerns about additional traffic on the A420 causing congestion.
- Safety concerns regarding additional traffic on the A420, including roundabout by Wicklesham and Great Coxwell junction.
- Proposals for workers to cross A420 are inadequate.
- A bridge over the A420 is needed.
- A420 carriageway should be widened.
- Toucan crossing connects with a non-existent cycle path into Faringdon.
- Any increase in traffic in this location would be significantly detrimental.
- Concern about traffic safety given proximity of schools.
- Concerned about the safety of the proposed pedestrian crossing close to roundabout.
- Traffic disruption will affect residents and visitors.
- Concerned about access to the site off A420 being so close to the existing roundabout.
- Proposed toucan crossing not adequate for cyclists, given slopes of embankment.
- Safety of access
- Might cause drivers to divert off the A420 through Faringdon, or other rat running of minor local roads

- Impacts on road through Fernham, Longcot, Shellingford villages when A420 closed.

3. *Officer Response: The traffic and highways impact of the proposal have been carefully considered by OCC as Highways Authority who have no objection.*

4. Suitability of Site

- Not suitable for industrial development
- Site is agricultural, not brown field
- Fertile farming land that should not be lost
- Site designated for agricultural use following quarrying
- Loss of fertile farmland
- A brownfield site should be used instead
- Too close to schools and residential areas
- Outside Faringdon's development boundary, Faringdon should not spread over A420
- Conflicts with the Local Plan
- Faringdon is not suitable for this type of development.
- Site is not allocated for employment use in the VOWH Local Plan, it was rejected by VOWH for this purpose
- Development would merge Little Coxwell into Faringdon
- Located within Great Western Community Forest.

5. *Officer Response: The policy position in relation to the site location is addressed in the main report. The site has been restored to agriculture as required by the quarry permission and now has green field status.*

6. Impacts on Quarry SSSI

- Will damage/destroy irreplaceable geology below the ground surface

7. *Officer Response: The application seeks to preserve the geological features. Following the comments received during the initial consultation period, a Geological Site Management Plan was submitted with the amended application, to provide further details of this. There has been no objection from Natural England.*

8. Concerns about data centre

- Requires lots of water
- Releases chemicals into drainage systems
- Concerned data centre use remains concealed amongst the listed use classes
- Potential spillage of toxic chemicals
- Impacts on power supply
- Black particulate air pollution

9. *Officer Response: No data centre is proposed. This is understood to relate to a previous version of the application submitted to the District Council for determination.*

10. Impacts on biodiversity

- Will destroy a CTA
- Will destroy habitat
- Two ponds created as part of the quarry restoration provide habitat for great crested newts
- Note that the PEA states there are no GCNs but there won't ever be if this goes ahead
- Concern about light pollution on ecology

11. *Officer Response: Biodiversity is considered in detail in the main report. The OCC Ecologist has carefully considered all the issues and does not object to the proposals.*

12. Impacts on landscape

- Will dominate views
- Buildings much higher than quarry walls
- Would block existing views of ancient countryside
- Scale is too big
- Would be visible from the Folly, White Horse Hill, Badbury Hill, The Old Barn, Ridgeway,
- Destruction of green space
- Proposed landscaping measures are tokenistic
- Impacts on setting of AONB
- Concern about lighting

13. *Officer Response: The application was amended to reduce maximum building heights in order to address these concerns raised during the first consultation. Landscape impacts are addressed in the main report. The OCC Landscape Officer has still concerns about the scale, bulk and appearance of the development that should be weighed into the planning balance when making a decision.*

14. Proposals not suitable

- Buildings too high and imposing.
- Multi-storey car parks too visible
- Multi-storey parking show that this would not be local employment
- Excessive parking provision will lead to emissions.
- Not enough detail about what is proposed.
- Scale of development too large for the area
- Does not accord with National Design Guide
- B8 uses should be excluded.

15. *Officer Response: The proposals were amended following the first consultation to address concerns that the buildings were too high. As this is an*

*outline application, detail has not been provided at this stage about the building design, layout and materials.*

**16. Impacts on Faringdon and local area**

- Utilities and infrastructure will become overloaded due to number of people.
- Employees relocating to Faringdon would put pressure on housing capacity and amenities, make town more expensive.
- Farmland is a useful natural drainage area.
- Would lead to ribbon development with further development in the adjacent quarry once worked.
- Alternative uses are needed more – a lake, nature reserve, education centre
- Would turn a market town into an industrial estate/ car park/ another Milton Keynes
- Concerned of precedent set by developing built extent of Faringdon south of the A420
- Loss of local green spaces and impact on mental health
- Little local benefit
- Amenity impacts on small, rural villages

**17. *Officer Response: The principle of employment use on this site has been accepted through the identification of the site in the Faringdon Neighbourhood Plan.***

**18. Environmental Impact**

- Concerned about air quality
- Noise from additional traffic
- Concerned about dust
- Absence of a lighting strategy
- Climate impacts

**19. *Officer Response: There has not been an objection from the Environmental Health Officer, although more detail would be required by condition for noise and dust assessments based on the final details, and also for a lighting plan. Climate impacts are addressed in the main report.***

**20. Impact on Nearby Properties**

- Don't want rural setting to change
- Noise from cars, labs, air conditioning

**21. *Officer Response: There has been no objection from the Environmental Health Officer in terms of direct impacts on specific properties. More detailed assessments will be required once full details of the design and layout are known.***

**22. Recreation**

- Impacts on bridleway and footpaths which are well used by walkers and runners

23. *Officer Response: Existing rights of way would remain open for the public to use. There are none within the site itself.*

#### 24. Employment use

- Will not benefit the local population, amount of car parking shows employees would travel from elsewhere
- Additional office space is not required, site on Park Road with outline permission remains a vacant eyesore
- Wicklesham Lodge Farm offers offices unobtrusively in rural setting
- Market demand evidence is not accurate, as Faringdon is not within the Oxford-Cambridge- London golden triangle
- Not within the Science Vale area – conflict with VLP2 15B

25. *Officer Response: The development of this site for employment use has been accepted in principle by the FNP.*

#### 26. Planning Process

- Faringdon Neighbourhood Plan requires any proposals at this site ensure a sensitive relationship between the quarry restoration conditions and the development, this has not been achieved.
- EIA should have been required
- Quarry permission required the site to be returned to agriculture
- Residents were not consulted on the proposal
- Site has previously been ruled against by court order
- Conflict with local plan policies
- Concerned that application is being determined by OCC not VOWH
- Quarry was only consented on the basis that it would be returned to agriculture
- Development of an SSSI is unlawful
- Outline planning process does not allow proper consideration
- Neighbourhood Plan is out of date
- Insufficient engagement with local communities
- Concern about the use of outline application to seek a decision before full details are available

27. *Officer Response: The correct planning process has been followed. The proposal is assessed against development plan policy in the main report.*

#### 28. Support

- Local residents voted for development of this land for business use
- New employment is needed in Faringdon due to increase in population

- Climate benefits to reducing commuting time
- Support the principle, but concerned about building height
- Support principle, but concerned about traffic and junction safety
- Would put Faringdon on the map – cutting edge life sciences
- The quarry being at the lower level reduces impact of buildings
- Would bring visitors to Faringdon and help shops
- Support but understand reservations and believe design issues can be ironed out through consultation and conditions
- Better hidden than some other recent development and more beneficial for the town.
- The development would not affect rock faces
- Site would be a stagnant lake without development
- Letter from a commercial property consultant confirming the demand for employment sites such as this

### **Representations specific to the second (June 2024) Consultation**

29. Many of the points raised in the second consultation re-iterated comments that had been received during the first consultation. These are addressed above. Representations received that were specific to the second consultation on the amended documents have been summarised below.

#### **30. Highways**

- Concerned that a bridge is still not being proposed – considered essential
- Suggest existing roundabout access is used instead
- Concern about impacts on users of the Wicklesham Farm access (e.g. residents)
- Not clear how pedestrian crossing would link to existing path through Oriel Gardens
- Additional A420 crossing point needed for Sandhill to Wicklesham ROW
- Increase in time to get out of Fernham turning due to congestion
- No bus stops serve the site well
- Problems at the roundabout due to no right turn into the site from the A420 could encourage rat running through the town centre

31. *Officer Response: Oxfordshire Transport Development Management do not object to the application and are satisfied that the proposal would not give rise to unacceptable impacts in terms of highway safety or capacity.*

#### **32. Location**

- Building here will prevent the A420 being dualled in future.
- SSSI should be protected – designated affects whole site not just the walls, concerned about below the ground
- Wildlife should be protected – within a conservation target area
- Loss of amenity land, footpaths are in regular use

- Foot of the Ridgeway
- This type of development should be in Swindon, not the open countryside.
- Next to an active quarry – unsuitable for proposed use
- This type of development should be on brownfield land.

33. *Officer Response: Following quarrying and restoration, the site has green field status. However, this does not necessarily mean that development is unacceptable, and it is identified in the FNP for employment use.*

#### 34. Landscape

- Impact on rural landscape character and views

35. *Officer Response: Landscape remained a key area of concern during subsequent consultations, despite the reduction in building height. This is addressed in the main report.*

#### 36. Support

- Economic benefits to Faringdon
- There is strong demand for this type of site
- Site is well located as it has proximity to Oxford without the constraints on electrical power supply in the Oxford area
- Site allocated in the FNP

### **Representations specific to the third (September 2024) Consultation**

37. Many of the points raised in the third consultation re-iterated comments that had been received during the earlier consultations, which have been addressed above. Representations received that were specific to the third consultation are summarised below.

#### 38. Height and Visual Impact

- Despite reduction in height, the buildings will still be visible above the quarry walls

*Officer comment – Landscape impacts are addressed in the report.*

#### 39. Planning Policy

- Contrary to OMWCS policy M10
- FNP is out of date, there has been no review since 2016
- FNP must be disregarded if the application is a County Matter
- High Court ruled that FNP is in conflict with the Vale Local Plan

*Officer comment – Relevant planning policies are fully addressed in the report. The site was adequately restored following the quarrying use and the application would not be a County Matter if submitted now and therefore the OMWCS policies are not considered relevant. Legal advice from OCC solicitors has confirmed that, taking into account the High Court decision, the FNP is lawful and forms part of the development plan. Whilst the judge did criticise some aspects of the process, the decision was that whilst there was some internal conflict and legal errors made, these were not so significant as to undermine the legality of the decision.*

#### 40. Geology/SSSI

- Proposed buffer zone for SSSI is inadequate as whole quarry is designated.
- Development would prevent access to quarry floor
- At least some of the site should be preserved for study
- Very important area

*Officer comment – This is addressed in the main report. Natural England have statutory responsibility for the SSSI and do not object.*

#### 41. Other comments

- The site should be made into a public park
- Reduction in height does not address the key issues of location and scale
- Should be located in Swindon
- Red line area does not include the land needed for the crossing and pedestrian link
- Inadequate demonstration of the need for the development
- Negative impacts on existing employment sites
- Ponds on site were deliberately destroyed and provided GCN habitat
- Site would not be attractive to large employers as it is too remote
- Given the failure to satisfy the Town Council the application should be refused
- Updated transport documents fail to demonstrate proposal is acceptable in respect to highways

*Officer comment – The Town Council did not object to this application during the third consultation. The application that has been submitted must be determined on its merits, it cannot be assessed against hypothetical other proposal types or locations which are not being proposed. OCC Transport Development Management have confirmed that it is not a problem that some of the proposed highways works fall outside of the red line area, as these can be secured by Section 278.*

#### 42. Support

- Potential alternative uses would have greater impacts

- Scheme is exactly what the UK needs to address its lack of lab space
- Would help other businesses and retail in Faringdon

### **Representations received after the end of the third consultation**

43. Eight further comments of objection on the application were received after the end of the third formal consultation periods, but before the application was amended and sent out to a fourth formal consultation period. These are summarised below:

- Disagree with OCC Ecologist comments as the ecology of the former quarry is linked to the aquifer and the site provides breeding and terrestrial habitats for newts and the site is in a Conservation Target Area
- Further formal consultation should be held on additional documents submitted since the end of the last consultation

44. *Officer Response: The OCC Ecologist has seen these comments and confirmed that nothing new had been raised that changed his comments on the application. He stated that the proposed scheme would remove all agricultural areas, which is not a habitat in line with CTA objectives and introduce habitats which are in line with CTA objectives. He stated that the area of the site to be developed has negligible suitability to support GCNs. There are some areas which may be suitable in other parts of the site, and the proposed measures for dealing with this (suite clearance under an ecological method statement) are considered acceptable. The pond did fill up during a flooding event, and updated ecological assessment required by condition will ensure that this is dealt with appropriately.*

45. *There is no requirement for further formal consultation on documents submitted to address queries raised by specific technical consultees.*

### **Representations received during the fourth consultation**

46. Thirty representations were received during the fourth consultation all in objection to the application. These comments largely repeated previous objections raised rather than specifically commenting on the reduced maximum building height and floorspace, although some confirmed that their fundamental objections remained regardless of the reduction in the scale of the proposed development. The main concerns raised are listed below:

- Building on green space
- Landscape impact
- Traffic – congestion and safety
- Noise
- Too large a scale for Faringdon
- Impacts on biodiversity
- Impacts on geodiversity and SSSI, including on the quarry floor

- Climate impacts
- Faringdon Neighbourhood Plan does not comply with Vale Local Plan
- There are more suitable sites available for employment use
- After outline permission is secured, the nature of the scheme will change. Section 106 should be used to secure the exact uses proposed
- Discrepancies in application documents; height of parking deck inconsistency and CIL form references data centre that has been removed from application
- Impacts on tourism
- Quarry has an 'aquifer-fed fluctuating water body' which is a priority habitat, supporting rare species
- Photos provided claiming to show Great Crested Newts near the site
- Contrary to policies protecting agricultural land and soils, as 45% of the site is graded 3a

47. *Officer Response – The report considers the proposals against relevant policies and addresses the topics of concern. In relation to the comments raised in relation to ecology, the OCC Biodiversity Officer had considered these and confirmed that they do not change his advice. He stated that no evidence has been provided to suggest that the water bodies on site meet the definition of aquifer fed naturally fluctuating waterbodies. He re-iterated that the site is largely unsuitable for Great Crested Newts and a condition for an updated ecological assessment based on the final design is sufficient. GCN surveys may be required at that point, if conditions have changed. The majority of the newts in the photos are smooth newts and there is no evidence of location.*

#### **Representations received during the fifth consultation**

48. Fifteen representations were received during the fifth consultation, one in support and fourteen objecting. These largely repeated concerns raised during earlier consultations, rather than focussing on the revisions to the landscaping which were the subject of the consultation. Points raised included impacts on ecology, the SSSI, traffic congestion, the loss of Faringdon's character through expansion, loss of agricultural land, inaccuracies in the application documents including concerns that there would be a greater number of employees than suggested in the traffic modelling. Representations also questioned the legal position of the Faringdon Neighbourhood Plan policy identifying this site for employment use due to conflicts with the Local Plan, which has been reviewed more recently and that the development is not and cannot be sustainable development in accordance with the NPPF High Court judgement and Local Plan Policy. These points are addressed elsewhere in this report.

49. The one representation in favour stated that Faringdon needs jobs locally and economic growth.

#### **Representations received during the sixth consultation**

50. Twelve representations were received during the sixth consultation, two in support and ten objecting. No new issues were raised, objections emphasised the inappropriateness of the development in this location and that there are brownfield sites not far away that should instead be used for this type of development, the adverse impact on Little Coxwell, the impact on the SSSI and the ecology of the application site and the unsuitability of the A420 for the associated traffic in terms of highway safety. Those in support emphasised the economic benefits to Faringdon including the provision of employment.

### **Representations received during the seventh consultation**

51. Fifteen representations were received during the seventh consultation, one in support and fourteen objecting. Objections included the position that the VOWH has never supported the identification of the site for employment development in its Local Plan. The VOWH Local Plan is the more recent development plan which does not designate the site for any development, showing the SSSI and that policy 4.5B of the Faringdon Neighbourhood Plan is therefore superseded. The High Court found the Faringdon Neighbourhood Plan to be unlawful. There is other employment land available in Faringdon. There is no demonstrable need including through increased population over the last 25 years and types of employment in Faringdon for the development and the Town Council should revisit the evidence base for the Neighbourhood Plan. The inappropriateness of the development in this location including the adverse landscape impact. There are brownfield sites not far away that should instead be used for this type of development. The adverse heritage impact including the setting of Lord Berner's Folly. The impact on the SSSI and the ecology of the application site. The impact on the amenity of local residents particularly those at Wicklesham Farm. The unsuitability of the A420 for the associated traffic in terms of highway safety and the increased congestion that would arise from the development. That in support emphasised the economic benefits to Faringdon including the provision of local employment.

### **Representations received during the eighth consultation**

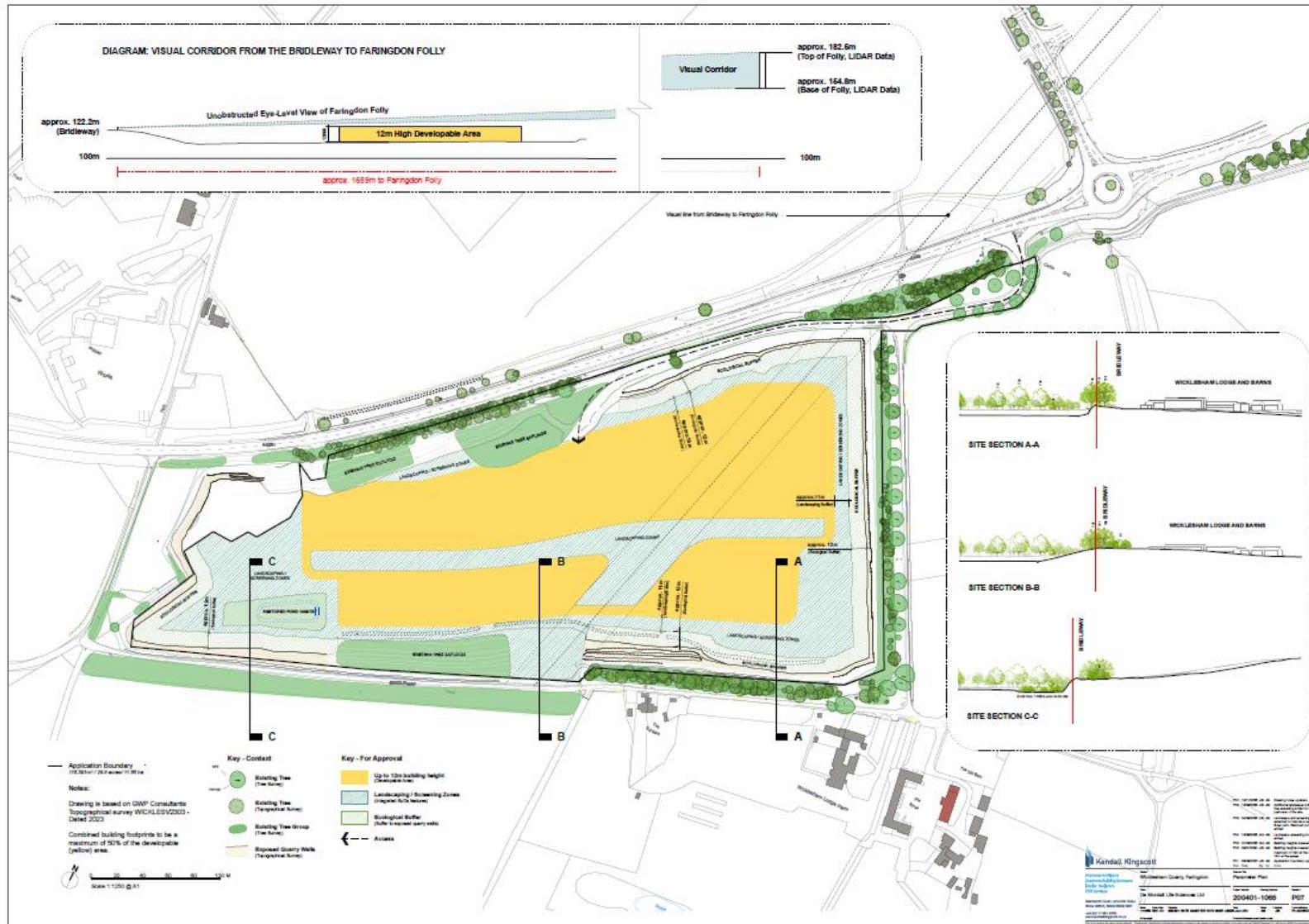
52. Five representations were received during the eighth consultation, all objecting to the application. Objections included strong opposition to any development on the site south of the A420. Calls for the land to be returned to farmland rather than used for industrial purposes. The site is highly significant for biodiversity and geodiversity, forming part of the West Oxfordshire Heights Conservation Target Area and designated as a Site of Special Scientific Interest (SSSI) - Wicklesham Quarry SSSI noted as globally unique for scientific research (Faringdon Sponge Gravels). Conflict with local and national conservation aims and strategic policies. The presence of over 30 Priority Species, including legally protected species and birds on DEFRA's Red and Amber lists. Strategic value for conservation highlighted in local and national policy. Failure to carry out required Protected Species Surveys and submit biodiversity reports. Concerns about qualifications of the applicant's ecologist and adequacy of ecological assessments. Criticism of Oxfordshire County Council for not enforcing validation requirements. Conflict with policies including VLP1 Core Policy 46, National Planning Policy Framework and

Conservation of Species Regulations 2017 and emphasis on refusal of permission where significant harm cannot be avoided or mitigated. Applicant accused of attempting to avoid accountability for biodiversity impacts. Concerns about officers' advice being based on assumptions rather than policy. Development described as an unplanned, major urban extension causing irreparable damage to biodiversity and geodiversity. Frustration over prolonged application process and perceived waste of council resources. All representations objected to the proposed development, citing irreparable harm to biodiversity and geodiversity, non-compliance with planning and conservation policies, inadequate ecological assessment, and the unique scientific and environmental value of the site. Respondents assert that no amendments or revisions could make the development acceptable.

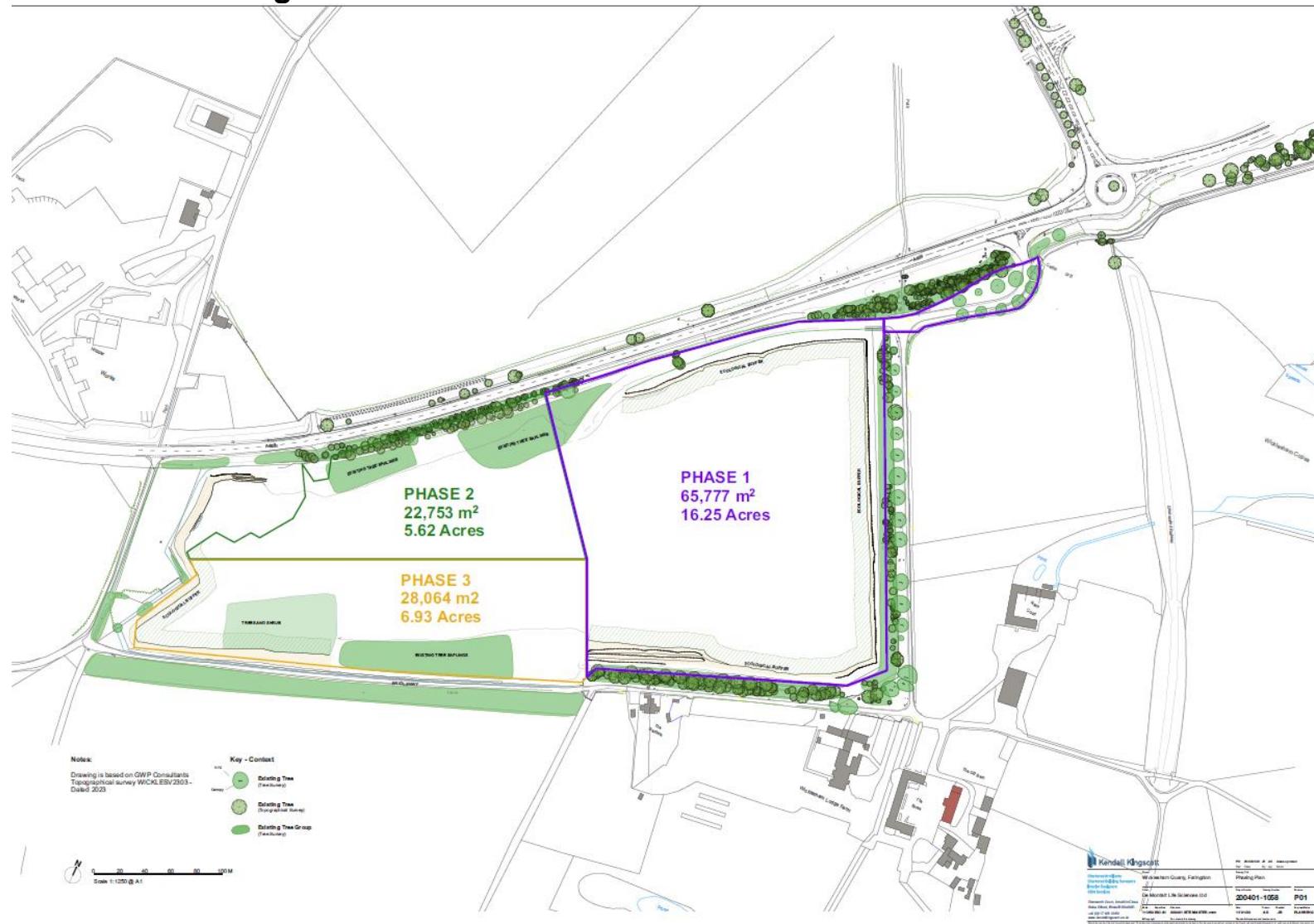
### **Representations received during the ninth consultation**

53. Four representations were received during the ninth consultation, three in objection and one in support of the application. That in support was in relation to job creation and local business. Objections included concerns about viability and access by alternative means of transport - the impracticality of walking/cycling and dangerous bus access even with a footbridge. Suspicion that the scheme might enable residential development on Wicklesham Farm land under the guise of housing for campus staff. Biodiversity and SSSI Status - concerns about destruction of habitats, impact on rare species, and loss of scientific value due to proposed changes like building up the quarry base. Over 30 Priority Species and numerous endangered birds present at the site. Contravention of Planning Rules – the site is outside the Faringdon development area, not allocated in the VOWH Local Plan, supposed to be restored to agriculture, not a brownfield site, and lies within a conservation area. Allegations of Illegality – the proposal is illegal and contrary to national planning policy guidance. Frustration over lengthy process and perceived willingness of planning officers to allow repeated revisions, wasting council resources. Call for Decisive Rejection - the council should reject the application entirely and no amendments could make the development suitable due to irreparable harm.

## Annex 5 – Site Parameter Plan



## Annex 6 – Phasing Plan



## **Annex 7 - European Protected Species**

The Local Planning Authority in exercising any of their functions, have a legal duty to have regard to the requirements of the Conservation of Species & Habitats Regulations 2017 (as amended) which identifies 4 main offences for development affecting European Protected Species (EPS).

1. Deliberate capture or killing or injuring of an EPS
2. Deliberate taking or destroying of EPS eggs
3. Deliberate disturbance of a EPS including in particular any disturbance which is likely
  - a) to impair their ability –
    - i) to survive, to breed or reproduce, or to rear or nurture their young, or
    - ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
  - b) to affect significantly the local distribution or abundance of the species to which they belong.
4. Damage or destruction of an EPS breeding site or resting place.

The recommendation:

Your officers consider that sufficient information has been submitted with the application which demonstrates that measures can be introduced which would ensure that an offence is avoided. The application is therefore not considered to have an adverse impact upon protected species provided that the stated mitigation measures are implemented.